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**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Reorganized Debtor.

Chapter 11

Case No. 19-34054-sgj11

Objection deadline: October 19, 2021 @ 5:00 p.m.
(CT)
Hearing Date: TBD

**SUMMARY COVER SHEET FOR THE TWENTY-FIRST MONTHLY AND FINAL FEE
APPLICATION OF SIDLEY AUSTIN LLP, ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE MONTHLY FEE PERIOD FROM
JULY 1, 2021 THROUGH AUGUST 11, 2021 AND THE FINAL FEE PERIOD FROM
OCTOBER 29, 2019 THROUGH AND INCLUDING AUGUST 11, 2021**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Name of Applicant:		Sidley Austin LLP
Authorized to Provide Professional Services to:		Official Committee of Unsecured Creditors of Highland Capital Management, LP
Date of Retention:		October 29, 2019 by Order entered January 9, 2019
Time period covered by the Monthly Fee Application:		July 1, 2021 – August 11, 2021
Total amount of fees requested in the Monthly Fee Application:		\$854,259.75
Total amount of reimbursable expenses sought in the Monthly Fee Application:		\$36,678.16
Time period covered by the Final Fee Application:		October 29, 2019 – August 11, 2021
Total amount of fees requested in the Final Fee Application:		\$13,134,805.20
Total amount of reimbursable expenses sought in the Final Fee Application:		\$211,841.25

This is a: monthly interim final application.

This is Sidley's twenty-first monthly and final fee application.

PRIOR MONTHLY APPLICATIONS FILED

		Requested		Approved		Outstanding	
Date Filed; Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1/10/20; #343	10/29/19- 11/30/19	\$993,818.70	\$10,247.88	\$993,818.70	\$10,247.88	\$0.00	\$0.00
1/31/20; #420	12/1/19- 12/31/19	\$878,331.60	\$30,406.08	\$878,331.60	\$30,406.08	\$0.00	\$0.00
3/4/20; #501	1/1/20- 1/31/20	\$711,364.50	\$12,673.30	\$711,364.50	\$12,673.30	\$0.00	\$0.00

3/20/20; #542	2/1/20- 2/29/20	\$571,444.65	\$2,927.21	\$571,444.65	\$2,927.21	\$0.00	\$0.00
4/20/20; #594	3/1/20- 3/31/20	\$596,045.25	\$14,406.39	\$596,045.25	\$14,406.39	\$0.00	\$0.00
5/20/20; #639	4/1/20- 4/30/20	\$548,274.15	\$5,765.07	\$548,274.15	\$5,765.07	\$0.00	\$0.00
6/22/20; #767	5/1/20- 5/31/20	\$429,530.85	\$2,758.75	\$429,530.85	\$2,758.75	\$0.00	\$0.00
7/20/20; #877	6/1/20- 6/30/20	\$617,236.20	\$5,759.29	\$617,236.20	\$5,759.29	\$0.00	\$0.00
8/19/20; #969	7/1/20- 7/31/20	\$663,867.90	\$10,470.96	\$663,867.90	\$10,470.96	\$0.00	\$0.00
9/19/20; #1074	8/1/20- 8/31/20	\$584,416.35	\$2,448.22	\$584,416.35	\$2,448.22	\$0.00	\$0.00
10/23/20; #1283	9/1/20- 9/30/20	\$446,112.45	\$2,204.73	\$446,112.45	\$2,204.73	\$0.00	\$0.00
11/30/20; #1490	10/1/20- 10/31/20	\$672,302.25	\$3,125.47	\$672,302.25	\$3,125.47	\$0.00	\$0.00
12/24/20; #1632	11/1/20- 11/30/20	\$502,074.90	\$3,643.80	\$502,074.90	\$3,643.80	\$0.00	\$0.00
1/26/21; #1842	12/1/20- 12/31/20	\$520,448.85	\$5,403.36	\$520,448.85	\$5,403.36	\$0.00	\$0.00
3/2/21; #1963	1/1/21- 1/31/21	\$819,656.10	\$6,612.00	\$819,656.10	\$6,612.00	\$0.00	\$0.00
4/5/21; #2160	2/1/21- 2/28/21	\$616,905.00	\$11,141.12	\$616,905.00	\$11,141.12	\$0.00	\$0.00
5/18/21; #2328	3/1/21- 3/31/21	\$464,802.75	\$6,279.02	\$371,842.20	\$6,279.02	\$0.00	\$0.00
6/1/21; #2396	4/1/21- 4/30/21	\$521,784.00	\$21,694.88	\$417,427.20	\$21,694.88	\$0.00	\$0.00
7/14/21; #2570	5/1/21- 5/31/21	\$540,936.00	\$4,983.88	\$432,748.80	\$4,983.88	\$0.00	\$0.00
8/2/21; #2651	6/1/21- 6/30/21	\$581,193.00	\$12,211.68	\$464,954.40	\$12,211.68	\$116,238.60	\$0.00

**SUMMARY OF TOTAL FEES AND HOURS
BY ATTORNEYS AND PARAPROFESSIONALS FOR THE MONTHLY FEE PERIOD
JULY 1, 2021 – AUGUST 11, 2021**

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed ²	Total Compensation
Suresh T. Advani	Partner Restructuring	1992	\$1,625	3.20	\$5,200.00
Matthew A. Clemente	Partner Restructuring	1998	\$1,350	186.40	\$251,640.00
Michael P. Goldman	Partner Insurance	1985	\$1,600	29.50	\$47,200.00
Paige H. Montgomery	Partner Litigation	2002	\$1,125	154.40	\$173,700.00
Penny R. Reid	Partner Litigation	1989	\$1,400	4.90	\$6,860.00
Dennis M. Twomey	Partner Restructuring	2000	\$1,350	2.70	\$3,645.00
Michael A. Clark	Senior Counsel Tax	1979	\$1,175	2.50	\$2,937.50
Mustafa Abdul-Jabbar	Associate Litigation	2016	\$930	11.90	\$11,067.00
Fabricio M. Archanjo	Associate Litigation	2016	\$885	.50	442.50
Elliot A. Bromagen	Associate Restructuring	2017	\$885	106.10	\$93,898.50
Ryan Fink	Associate Restructuring	2021	\$590	9.60	\$5,856.00
Patrick G. Foley	Associate Litigation	2013	\$1,025	3.40	\$3,485.00
Juliana Hoffman	Associate Restructuring	2017	\$815	20.40	\$16,626.00
Taylor Nifong	Associate Restructuring	2020	\$610	144.00	\$87,840.00
Chandler M. Rognes	Associate Litigation	2019	\$715	206.30	\$147,504.50
Alyssa Russell	Associate Restructuring	2015	\$970	1.70	\$1,649.00
J.P. Hong	Staff Attorney Insurance	2011	\$1,020	55.70	\$56,814.00
Nancy P. Cade	Paralegal Litigation	30 years	\$450	11.70	\$5,265.00
Crystal Clark	Paralegal Litigation	10 years	\$415	3.30	\$1,369.50
David J. Lutes	Paralegal Restructuring	35 years	\$490	43.80	\$21,462.00
Danielle Griffith	Research Analyst Library	3 years	\$240	13.80	\$3,312.00

² Sidley charged for only 50% of non-working travel time. Such reductions are reflected in the figures in this column.

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed ²	Total Compensation
Bill Kirchoff	Research Analyst Library	20 years	\$270	5.20	\$1,404.00
Total				1,021.00	\$949,177.50
10% Discount					\$94,917.75
Grand Total					\$854,259.75
Blended Rate					\$836.69

**STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY
FOR THE MONTHLY FEE PERIOD COVERING
JULY 1, 2021 – AUGUST 11, 2021**

Task Description	Total Hours	Total Fees
002 – Asset Disposition	1.00	\$908.00
005 – Committee Meetings	11.60	\$10,444.00
006 – Business Operations	7.80	\$10,237.00
007 – Case Administration	27.10	\$29,972.00
008 – Claims Administration and Objections	.60	\$810.00
009 – Corporate Governance and Board Matters	1.20	\$732.00
011 – Retention	4.80	\$5,271.00
012 – Fee Applications	48.20	\$28,184.50
014 – Litigation	647.10	\$548,318.50
015 – Plan and Disclosure Statement	260.80	\$299,417.50
016 – Non-Working Travel ³	0.00	\$0.00
021 – Tax	5.70	\$8,137.50
024 – Creditor Communications	5.10	\$6,745.50
TOTAL	1,021.00	\$949,177.50
TOTAL WITH 10% DISCOUNT	1,021.00	\$854,259.75

³ As noted above, Sidley charged the Debtor for only 50% of non-working travel time.

EXPENSE SUMMARY FOR THE MONTHLY FEE PERIOD
JULY 1, 2021 – AUGUST 11, 2021

Category	Amount
Copying	\$87.62
Court Costs	\$443.50
Delivery Services/Messenger	\$137.49
Litigation Support Vendors	\$18,418.65
On-line Research Services (Westlaw, Lexis, Pacer and related services)	\$974.19
Outside Printing	\$4,646.33
Out-of-Town Travel (includes lodging, air, ground and meals)	\$2,481.10
Postage	\$726.00
Professional Services/Specialists (includes Accurint, TransUnion, CT Corporation and related corporate services)	\$556.78
Telephone (includes non-local calls)	\$1.05
Transcripts (includes trial and deposition transcripts)	\$8,205.45
TOTAL:	\$36,678.16

SUMMARY OF TOTAL FEES AND HOURS
BY ATTORNEYS AND PARAPROFESSIONALS FOR THE FINAL FEE PERIOD
OCTOBER 29, 2019 – AUGUST 11, 2021

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate ⁴	Total Hours Billed ⁵	Total Compensation
Suresh T. Advani	Partner Restructuring	1992	\$1,625	50.90	\$79,652.50
Jessica C. Boelter	Partner Restructuring	2002	\$1,100	3.00	\$3,300.00
David R. Carpenter	Partner Litigation	2004	\$1,175	1.60	\$1,880.00
Matthew A. Clemente	Partner Restructuring	1998	\$1,350	2,968.30	\$3,826,267.50
Thomas D. Cunningham	Partner Litigation	1995	\$1,200	9.80	\$11,760.00
Michael P. Goldman	Partner Insurance	1985	\$1,600	75.20	\$120,320.00
Bojan Guzina	Partner Restructuring	2002	\$1,275	324.90	\$388,890.00
Bradley D. Howard	Partner Investment Funds	1998	\$1,200	1.50	\$1,800.00

⁴The hourly billing rates only reflect the highest billing rate used by a timekeeper in this case during the Final Fee Period.

⁵ Sidley charged for only 50% of non-working travel time. Such reductions are reflected in the figures in this column.

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate ⁴	Total Hours Billed ⁵	Total Compensation
Kenneth Kansa	Partner Restructuring	1999	\$1,275	1.30	\$1,657.50
Robert D. Keeling	Partner Litigation	2000	\$1,125	1.50	\$1,687.50
William D. Kerr	Partner Investment Funds	1984	\$1,500	.30	\$450.00
Mark Kirsons	Partner Global Finance	1997	\$1,225	1.30	\$1,592.50
Thomas Labuda	Partner Restructuring	1994	\$1,350	.20	\$270.00
Paige H. Montgomery	Partner Litigation	2002	\$1,125	1,280.50	\$1,387,120.00
Andrew F. O'Neill	Partner Restructuring	2005	\$1,100	65.40	\$71,940.00
Alexi Poretz	Partner Insurance	1999	\$1,150	.30	\$345.00
Kevin R. Pryor	Partner Tax	1997	\$1,250	.30	\$375.00
Penny R. Reid	Partner Litigation	1989	\$1,400	799.20	\$1,059,517.50
Simon M. Saddleton	Partner Investment Funds	2008	\$1,025	42.40	\$41,560.00
Dennis M. Twomey	Partner Restructuring	2000	\$1,350	860.00	\$1,076,265.00
Patrick S. Casey	Senior Counsel Labor/Employment	1984	\$1,100	2.10	\$2,310.00
Michael A. Clark	Senior Counsel Tax	1979	\$1,175	2.80	\$3,290.00
Chuck Daly	Counsel Investment Funds	2002	\$985	.60	\$591.00
William A. Evanoff	Counsel Restructuring	2000	\$1,050	1.30	\$1,365.00
Eli Nelson	Counsel Litigation	1997	\$945	4.40	\$3,932.50
Charles Persons	Counsel Restructuring	2007	\$975	36.40	\$34,010.00
David Sillers	Counsel Litigation	2010	\$975	88.70	\$86,482.50
Allison R. Stromberg	Counsel Restructuring	2008	\$975	342.60	\$329,550.00
Mustafa Abdul-Jabbar	Associate Litigation	2016	\$930	359.90	\$316,833.00
Mitchell Alleluia- Feinberg	Associate Litigation	2017	\$775	19.30	\$13,921.50
Fabricio M. Archanjo	Associate Litigation	2016	\$885	.50	\$442.50
Andres Barajas	Associate Restructuring	2017	\$635	14.80	\$9,398.00
Elliot A. Bromagen	Associate Restructuring	2017	\$885	1,595.60	\$1,253,527.00

Name	Position / Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate ⁴	Total Hours Billed ⁵	Total Compensation
Ian C. Ferrell	Associate Restructuring	2021	\$590	14.30	\$8,613.00
Ryan Fink	Associate Restructuring	2021	\$610	105.70	\$64,129.00
Patrick G. Foley	Associate Litigation	2013	\$1,025	737.70	\$703,449.50
Sophie V. Franks	Associate Litigation	2020	\$610	.50	\$305.00
Nidhi George	Associate Litigation	2020	\$610	5.00	\$3,050.00
Trevor M. Grayeb	Associate Restructuring	Pending	\$550	394.70	\$211,412.00
Juliana Hoffman	Associate Restructuring	2017	\$815	645.20	\$458,898.00
Seulbee Lee	Associate Insurance	2015	\$970	33.70	\$32,689.00
Ray Magnum	Associate Litigation	2011	\$905	.80	\$724.00
Taylor Nifong	Associate Restructuring	2020	\$610	517.30	\$315,343.00
Chandler M. Rognes	Associate Litigation	2019	\$715	1,293.90	\$822,321.50
Alyssa Russell	Associate Restructuring	2015	\$970	1,329.50	\$1,181,373.00
Justin F. Song	Associate Restructuring	2018	\$635	74.30	\$47,180.50
Max Sternberg	Associate Insurance	2020	\$715	.50	\$357.50
Seth A. Yarkony	Associate Investment Funds	2017	\$635	15.40	\$9,779.00
J.P. Hong	Staff Attorney Insurance	2011	\$1,020	57.20	\$58,344.00
Nancy P. Cade	Paralegal Litigation	30 years	\$450	138.40	\$55,176.00
Crystal Clark	Paralegal Litigation	10 years	\$415	77.50	\$30,378.50
David J. Lutes	Paralegal Restructuring	35 years	\$490	949.60	\$444,234.50
Kathleen M. O'Connell	Paralegal Litigation	33 years	\$380	11.20	\$4,283.50
Pamela Santos	Paralegal Restructuring	19 years	\$410	3.00	\$1,230.00
Christopher Peel	Project Assistant Corporate	1 year	\$205	2.80	\$574.00
Cole M. Werner	Project Assistant Litigation	1 year	\$275	2.10	\$577.50
Britnee Cole	Research Analyst Library	16 years	\$240	.40	\$96.00
Danielle Griffith	Research Analyst Library	3 years	\$240	17.90	\$4,242.00

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate ⁴	Total Hours Billed ⁵	Total Compensation
Bill Kirchoff	Research Analyst Library	20 years	\$270	6.70	\$1,809.00
Elisabeth Nosarios	Research Analyst Library	10 years	\$225	1.00	\$225.00
Marco Ruiz	Research Analyst Library	2 years	\$225	1.80	\$405.00
Ronnie Schulman	Research Analyst Library	16 years	\$240	2.60	\$582.00
Judy Yu	Research Analyst Library	11 years	\$240	.60	\$144.00
Total				15,398.20	\$14,594,228.00
10% Discount					\$1,459,422.80
Grand Total					\$13,134.805.20
Blended Rate					\$853.01

**STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY
FOR THE FINAL FEE PERIOD COVERING
OCTOBER 29, 2019 – AUGUST 11, 2021**

Task Description	Total Hours	Total Fees
001 – Asset Analysis and Recovery	77.00	\$71,252.50
002 – Asset Disposition	2.10	\$1,958.00
004 – Avoidance Action Analysis	1.90	\$1,681.50
005 – Committee Meetings	881.40	\$815,133.50
006 – Business Operations	1,007.50	\$1,015,345.00
007 – Case Administration	1,220.30	\$1,252,430.00
008 – Claims Administration and Objections	201.30	\$215,096.50
009 – Corporate Governance	472.70	\$474,639.50
010 – Employee Benefits and Pensions	49.50	\$49,788.00
011 – Retention	307.00	\$239,761.50
012 – Fee Applications	994.70	\$532,434.50
013 – Financing and Cash Collateral	7.20	\$8,606.00
014 – Litigation	7,471.50	\$6,987,134.50
015 – Plan and Disclosure Statement	2,200.80	2,355,776.00

016 – Non-Working Travel ⁶	50.50	\$55,171.00
019 – Relief from Stay and Adequate Protection	70.60	\$61,638.00
021 – Tax	57.10	\$85,748.50
023 – Venue Transfer Motion	130.80	\$128,706.50
024 – Creditor Communications	194.30	\$241,927.00
TOTAL	15,398.20	\$14,594,228.00
TOTAL WITH 10% DISCOUNT	15,398.20	\$13,134,805.20

EXPENSE SUMMARY FOR THE FINAL FEE PERIOD
OCTOBER 29, 2019 – AUGUST 11, 2021

Category	Amount
Copying	\$2,035.03
Court Costs	\$5,171.63
Delivery Services/Messenger	\$3,702.40
Litigation Support Vendors	\$62,328.54
Local Travel (includes parking at court and validations for depositions)	\$336.12
Meals (includes conference room working meal meetings with client and constituents)	\$609.06
On-line Research Services (Westlaw, Lexis, Pacer and related services)	\$52,348.38
Out-of-Town Travel (includes lodging, air, ground and meals)	\$32,632.25
Outside Printing	\$6,763.84
Postage	\$841.45
Professional Services/Specialists (includes Accurint, TransUnion, CT Corporation and related corporate services)	\$621.78
Telephone (includes non-local calls)	\$2,517.59
Transcripts (includes trial and deposition transcripts)	\$41,933.18
TOTAL:	\$211,841.25

⁶ As noted above, Sidley charged the Debtor for only 50% of non-working travel time.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Reorganized Debtor.

Chapter 11

Case No. 19-34054-sgj11

Objection deadline: October 29, 2021 @ 5:00 p.m.
(CT)
Hearing: TBD

**TWENTY-FIRST MONTHLY AND FINAL FEE APPLICATION OF SIDLEY AUSTIN
LLP, ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE MONTHLY FEE PERIOD FROM JULY 1, 2021 THROUGH AND
INCLUDING AUGUST 11, 2021 AND FOR THE FINAL FEE PERIOD FROM
OCTOBER 29, 2019 THROUGH AND INCLUDING AUGUST 11, 2021**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), and the Delaware Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, entered on November 14, 2019 [Docket No. 136] (the “Interim Compensation Procedures Order”), Sidley Austin LLP (“Sidley”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby files this twenty-first monthly and final fee application (this “Application”) for entry of an order (the “Order”), substantially in the form attached to this Application as **Exhibit A** granting allowance of (a) compensation for professional services to the Committee during the period from July 1, 2021 to and including

¹ The Debtor’s last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

August 11, 2021 (the “Monthly Fee Period”) in the amount of \$854,259.75, and reimbursement of the actual and necessary expenses incurred by Sidley during the Monthly Fee Period, in the amount of \$36,678.16; (b) granting final allowance and approval of final compensation for professional services Sidley rendered to the Committee during the period October 29, 2019 through and including August 11, 2021 (the “Final Fee Period”) in the amount of \$13,134,805.20, and final reimbursement of the actual and necessary expenses that Sidley incurred during the Final Fee Period, in the amount of \$211,841.25; (c) authorizing an directing the Reorganized Debtor to pay Sidley all the foregoing fees and expenses, less any amounts the Debtor or Reorganized previously paid to Sidley on account of such amounts, and (d) grant such other and further relief this Court deems just and proper. In support of this Application, Sidley submits the declaration of Matthew A. Clemente, a partner of Sidley (the “Clemente Declaration”), which is attached hereto as Exhibit

B. In further support of the Application, Sidley respectfully represents as follows:

STATUS OF CASE AND JURISDICTION

1. On October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”). The Debtor has continued in possession of its properties and has continued to operate and manage its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On October 29, 2019, the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed its Notice of Appointment of Committee of Unsecured Creditors [Docket No. 65].

3. On November 14, 2019, the Delaware Court signed the Interim Compensation Procedures Order, authorizing certain professionals and members of any official

committee (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to procedures specified therein. The Interim Compensation Procedures Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within twenty-one (21) days after service of the monthly fee application the Debtor is authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending December 31, 2019 and at three-month intervals or such other intervals convenient to the Court, each Professional shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. On December 4, 2019, the Delaware Court entered an order transferring venue of this case from the District of Delaware to the Northern District of Texas [Docket No. 1084].

5. The United States Bankruptcy Court for the Northern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

6. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

7. The statutory and other bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, Local Rule 2016-1, and the Interim Compensation Order. This Application also substantially complies with the requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. §330 by Attorneys in Larger Chapter 11 Cases, Effective as of November 1, 2013* (the “U.S. Trustee Guidelines”),

and the *General Order 2006-02 Regarding Procedures For Complex Chapter 11 Cases* from the United States Bankruptcy Court Northern District of Texas.

8. The Committee retained Sidley as its bankruptcy counsel, *nunc pro tunc*, to October 29, 2019, pursuant to the *Order Authorizing the Retention and Employment of Sidley Austin LLP as Counsel to the Official Committee of Unsecured Creditors, Nunc Pro Tunc to October 29, 2019* [Docket No. 334] (the “Retention Order”). The Retention Order authorizes the Committee to compensate and reimburse Sidley in accordance with the terms and conditions set forth in the Committee’s application to retain Sidley, subject to Sidley’s application to the Court.

9. On February 22, 2021, the Court entered the *Order (I) Confirming the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.(As Modified) and (II) Granting Related Relief* [Docket No. 1943] (the “Confirmation Order”) confirming the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified) [Docket No. 1808] (as amended, supplemented, or modified, the “Plan”).

10. The Effective Date of the Plan occurred on August 11, 2021. See *Notice of Occurrence of Effective Date of Confirmed Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket No. 2700] (“Effective Date Notice”). As per the Effective Date Notice, unless otherwise ordered by the Court, all final requests for payment of Professional Fee Claims must be filed no later than 60 days after the Effective Date.

SIDLEY’S PRIOR FEE APPLICATIONS

11. The Interim Compensation Order provides that, during pendency of this Chapter 11 Case, all retained professionals shall file with the Court monthly applications for interim allowance of compensation of services rendered and reimbursement of expenses incurred in connection with such services, together with copies of the applicable time records

and itemized expenses (each a “Monthly Fee Application”). Prior to this Application and pursuant to the procedures set forth in the Interim Compensation Order, Sidley has filed with the Court and served upon the appropriate notice parties twenty separate Monthly Fee Applications covering the period from October 29, 2019 through June 30, 2021. Each of Sidley’s Interim and Monthly Fee Applications contain detailed time and expense records which relate to the periods covered by each Monthly Fee Application and each is incorporated herein by reference.² The detailed records of time expended providing professional services to the Committee for the Monthly Fee Period as well as the period covering the Twentieth Monthly Fee Application are attached hereto as **Exhibit C**. A detailed statement of Sidley’s out-of-pocket expenses incurred during Monthly Fee Period as well as the period covering the Twentieth Monthly Fee Application are attached hereto as **Exhibit D**.

12. In addition to establishing procedures for the submission of Monthly Fee Applications, the Interim Compensation Order provides that, beginning with the period from the Petition Date to and including February 29, 2020, and continuing at regular intervals thereafter during the pendency of this Chapter 11 Case, each professional may file with the Court an application for interim approval and allowance of any outstanding compensation for services rendered and reimbursement of expenses sought in the Monthly Fee Applications filed during such period.

13. A summary of the Monthly and Interim Fee Applications previously filed in this Chapter 11 Case is set forth in the chart below:

² Detailed time and expense records which relate to the periods covered by each Monthly Fee Application were also attached to the Interim Fee Applications at Exhibit C and Exhibit D respectively. See chart at paragraph 13 for docket references and other details.

		Requested		Approved		Outstanding	
Date Filed; Docket Nos.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1st Interim ³ ; 4/7/20; [ECF No. 569]	10/29/19 – 2/29/20	\$3,154,959.45	\$56,254.47	\$3,154,959.45	\$56,254.47	\$0.00	\$0.00
2nd Interim 7/14/20; [ECF No. 831]	3/1/20 – 5/31/20	\$1,573,850.25	\$22,930.21	\$1,573,850.25	\$22,930.21	\$0.00	\$0.00
3rd Interim; 10/27/20; [ECF No. 1296]	6/1/20 – 8/31/20	\$1,865,520.45	\$18,678.47	\$1,865,520.45	\$18,678.47	\$0.00	\$0.00
4th Interim; 1/27/21; [ECF No. 1853]	9/1/20 – 11/30/20	\$1,620,489.60	\$8,974.00	\$1,620,489.60	8,974.00	\$0.00	\$0.00
5th Interim; 4/21/21; [ECF No. 2233]	12/1/20 – 2/28/21	\$1,957,009.95	\$23,156.48	\$1,957,009.95	\$23,156.48	\$0.00	\$0.00
6th Interim 7/19/21; [ECF No. 2585]	3/1/21 – 5/31/21	\$1,527,522.75	\$32,957.78	\$1,527,522.75	\$32,957.78	\$0.00	\$0.00
20th Monthly; 8/2/21; [ECF No. 2651]	6/1/21 – 6/30/21	\$581,193.00	\$12,211.68	\$464,954.40	\$12,211.68	\$116,238.60	\$0.00
Total		\$12,280,545.45	\$175,163.09	\$12,164,306.85	\$173,163.09	\$116,238.60	\$0.00

RELIEF REQUESTED

14. By this Application, Sidley respectfully requests entry of an order
- (a) granting allowance and approval of compensation for Sidley's services to the Committee for the Monthly Fee Period in the amount of \$854,259.75, and reimbursement of expenses that Sidley incurred during the Monthly Fee Period in the amount of \$36,678.16; (b) granting final allowance and approval of compensation payments for Sidley services to the Committee during the Final Fee Period in the amount of \$13,134,805.20 and reimbursement of expenses that Sidley incurred during the Final Fee Period in the amount of \$211,841.25; (c) authorizing an directing the Reorganized Debtor to pay Sidley all the foregoing fees and expenses, less any amounts the Debtor or Reorganized previously paid to Sidley on account of such amounts, and
 - (d) grant such other and further relief this Court may deem just and proper.

³ Sidley's First Interim Fee Application incorporated Sidley's first, second, third and fourth Monthly Fee Statements.

FEES EARNED DURING THE FINAL FEE PERIOD

I. Customary Billing Disclosures

15. Sidley's hourly rates are set at a level designed to compensate Sidley fairly for the work of its attorneys and paraprofessionals and to cover fixed and routine expenses. The hourly rates charged by Sidley in this Chapter 11 Case were billed in accordance with Sidley's rates and procedures in effect during the Final Fee Period and in accordance with the Retention Order. As described in the Retention Application, the rates Sidley charges for the services of its attorneys and paraprofessionals in this Chapter 11 Case are consistent with the rates Sidley charges other comparable chapter 11 clients, regardless of the location of the case. Moreover, Sidley's rate structure is appropriate and not significantly different from the rates that Sidley charges for non-bankruptcy representations or the rates that other comparable counsel would charge to perform substantially similar services.

16. Sidley has received no payment or promises of payment from any source other than the Committee for services rendered in this Chapter 11 Case. There is no agreement or understanding between Sidley and any other entity or person, other than members of the Firm, for the sharing of compensation to be received for services rendered in or in connection with this Chapter 11 Case. All professional and paraprofessional services for which Sidley is requesting compensation were rendered solely on behalf of the Committee.

II. Supporting Documentation

17. For the convenience of the Court and parties in interest and in accordance with paragraph C of the U.S. Trustee Guidelines, the following information is prefixed to this Application:

- (a) a cover sheet summarizing the contents of this Application;

- (b) schedules identifying all Sidley attorneys and paraprofessionals who provided services to the Committee during the Monthly and Final Fee Period, including, with respect to each attorney and paraprofessional, as applicable, his or her position and area of expertise, date of admission or years of experience, hourly rate, hours billed and total fees charged;
- (c) a summary of Sidley's compensation by project matter category for services provided to the Committee during the Monthly and Final Fee Period; and
- (d) a summary of the actual and necessary expenses that Sidley incurred during the Monthly and Final Fee Period in connection with its professional services to the Committee.

18. In addition: (a) the Clemente Declaration, which includes, among other things, a statement under paragraph C.5 of the U.S. Trustee Guidelines, is attached hereto as **Exhibit B**; (b) the budget and staffing plan of Sidley for the period from June 1, 2021 to and including August 11, 2021 is attached hereto as **Exhibit E**; and (c) Sidley's disclosures of customary and comparable compensation, including blended hourly rates, for the period of June 1, 2021 to and including August 11, 2021 and the Final Fee Period is attached hereto as **Exhibit F**.

SUMMARY OF SERVICES

19. During the Final Fee Period, Sidley vigorously represented the Committee and enhanced its understanding of many issues critical in this Chapter 11 Case, thereby providing their constituency with the opportunity to obtain a meaningful recovery. During the Final Fee Period, the Committee: (a) sought and obtained an order transferring venue of this Chapter 11 Case from the Delaware Court to this Court, (b) negotiated a term sheet between the with the Debtor that settled certain objections of the Committee and provided, among other things, (i) a new governance structure made up of an independent board of directors, (ii) comprehensive reporting protocols ensuring proper oversight of the Debtor, and (iii) standing for the Committee to pursue certain claims held by the Debtor's estate;

(c) prosecuted key discovery issues, including procuring an order requiring preservation of documents, (d) negotiated various stipulations, settlement agreements, and consensual resolutions to outstanding motions, (e) negotiated for a plan of reorganization acceptable to creditors, including designing the structure of the post reorganization Debtor and strategizing with the Debtor to maximize value and decrease costs for the benefit of all stakeholders (f) commenced and pursued critical investigations, both independently and alongside the Litigation Trustee, and (g) monitored and participated in various litigation proceedings, including depositions, adversary proceedings and Fifth Circuit and district court appeals. The advice and assistance of Sidley in connection with these and all other facets of the Committee's oversight of the Debtor's reorganization serves as the basis for the compensation requested in this Application.

20. The following paragraphs summarize the most significant professional services rendered by Sidley on behalf of the Committee during the period of June 1, 2021 through August 11, 2021 (the last two monthly fee application fee periods not covered by prior interim fee applications), grouped into the categories set forth below. Sidley attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. As noted above, detailed time entries for the Monthly Fee Period as well as the period covering the Twentieth Monthly Fee Application are attached hereto at **Exhibit C** and detailed time records for the rest of the Final Fee Period are attached to the applicable Interim and Monthly Fee Applications filed on the docket of this case, which are incorporated herein by reference.⁴

⁴ See chart at paragraph 13 above for docket references and other details.

(a) Asset Disposition – Category No. 02

Monthly Fee Period: 1.00 hour; \$908.00
Final Fee Period: 2.10 hours; \$1,958.00

21. This matter category includes time spent by Sidley attorneys reviewing and analyzing asset purchase proposals from various third parties, including the Debtor's former principal.

(b) Committee Meetings – Category No. 5

Monthly Fee Period: 11.60 hours; \$10,444.00
Final Fee Period: 881.40 hours; \$815,133.50

22. This matter category includes time spent by Sidley attorneys and paraprofessionals in connection with regular and special meetings held telephonically with the Committee, the Committee's other professional advisors, and the Committee members' advisors.

(c) Business Operations – Category No. 6

Monthly Fee Period: 7.80 hours; \$10,237.00
Final Fee Period: 1,007.50 hours; \$1,015,345.00

23. This matter category includes time spent by Sidley attorneys analyzing and performing diligence on various asset sales, distributions, and other transactions proposed by third parties in furtherance of the Committee's oversight role under the agreed protocols. This matter category also includes strategic discussions with the Committee's financial professionals, the Debtor's professionals, and the Debtor's independent directors.

(d) Case Administration – Category No. 7

Monthly Fee Period: 27.10 hours; \$29,972.00
Final Fee Period: 1,220.30 hours; \$1,252,430.00

24. This matter category includes time spent on various tasks that were necessary to ensure the efficient administration of legal services related to this Chapter 11 Case.

Specifically, Sidley attorneys and paraprofessionals spent time (i) coordinating, managing and administering this Chapter 11 Case, including reviewing filings on the case docket, monitoring critical dates, and maintaining a case calendar, work plan and status reports; (ii) communicating with the Committee, its members, their advisors and the Debtor's counsel to manage various work streams throughout the Chapter 11 Case; (iii) reviewing procedures for case administration and docket monitoring; (iv) organizing and maintaining document files for the case; (v) ensuring compliance with service and notice requirements of the Bankruptcy Code, the Bankruptcy Rules, Local Rules, including coordinating service of pleadings and related notices with the Debtor's claims and noticing agent; (vi) ensuring compliance with all other applicable requirements of the Bankruptcy Code, Bankruptcy Rules, Local Rules and orders and procedures issued by the Court; (vii) reviewing monthly operating reports of the Debtor; and (viii) communicating with the Court regarding hearings and various procedural matters. This matter category also includes work and meetings related to multiple matters such that the time cannot be easily allocated to one of the other matter categories.

(e) Claims Administration and Objections – Category No. 8

Monthly Fee Period: .60 hours; \$810.00
Final Fee Period: 201.30 hours; \$215,096.50

25. This matter category includes time spent by Sidley attorneys reviewing and analyzing various proofs of claim filed against the Debtor, as well as the terms of proposed settlement agreements and 9019 motions in connection with claims against the estate. Additionally, Sidley reviewed, assessed and advised the Committee on implications of claim transfers as well as certain tax distribution claims. This matter category also includes strategic discussions and review of the Debtor's claims analysis and proposal for reducing the Debtor's

claim pool, as well as the Committee's own analysis of implications for disputing or settling Debtor claims.

(f) Corporate Governance and Board Matters – Category No. 9

Monthly Fee Period: 1.20 hours; \$732.00
Final Fee Period: 472.70 hours; \$474,639.50

26. This matter category includes time spent by Sidley attorneys in connection with the Debtor's governance structure, including participating and advising the Committee on communications and conferences with the Debtor's independent board of directors. This matter category also includes time spent analyzing and strategizing with other professionals regarding the Debtor's post-effective date governance structure, as well as critical matters pertaining to the D&O policies.

(g) Retention – Category No. 11

Monthly Fee Period: 4.80 hours; \$5,271.00
Final Fee Period: 307.00 hours; \$239,761.50

27. This matter category includes time spent by Sidley attorneys and paraprofessionals providing services related to the negotiation of the terms of the Litigation Trustee's engagement, as well as the execution and filing of its engagement letter and retention application. This matter category also includes time spent by Sidley attorneys conducting, reviewing and filing the customary supplemental conflicts check.

(h) Fee Applications – Category No. 12

Monthly Fee Period: 48.20 hours; \$28,184.50
Final Fee Period: 994.70 hours; \$532,434.50

28. This matter category includes time spent by Sidley attorneys and paraprofessionals: (i) preparing monthly and interim fee application materials and exhibits; (ii) ensuring that the time entries and expense entries for which Sidley is requesting

compensation and reimbursement pursuant to this Application comply with the applicable provisions of the Bankruptcy Rules, Local Rules and the U.S. Trustee Guidelines; (iii) reviewing the U.S. Trustee Guidelines; (iv) advising the Committee's other professionals on matters related to fee applications and compliance with U.S. Trustee Guidelines and Local Rules; and (v) engaging in correspondence with the Committee and its other professionals regarding the same.

(i) Financing and Cash Collateral – Category No. 13

Monthly Fee Period: 0.00 hours; \$0.00
Final Fee Period: 7.20 hours; \$8,606.00

29. This matter category includes time spent by Sidley attorneys providing services in connection with the Debtor's exit financing. Specifically, Sidley reviewed, analyzed and advised the Committee on the terms of the proposed exit financing and engaged in strategic discussions with the Debtor's Board and team of professionals to assess the impact the financing would have on the Plan's effectiveness.

(j) Litigation – Category No. 14

Monthly Fee Period: 647.10 hours; \$548,318.50
Final Fee Period: 7,471.50 hours; \$6,987,134.50

30. This matter category includes time spent by Sidley attorneys and paraprofessionals providing services related to matters in an adversarial posture, as well as investigating potential claims and causes of action held by the Debtor's estate. Specifically, Sidley attorneys spent time: (i) assessing potential causes of action to leverage estate value and developing strategy for such potential litigation; (ii) researching, prosecuting and analyzing various discovery-related issues and pleadings, including the Committee's Preservation Motion, privilege logs and document review; (iii) analyzing and advising the Committee on various pleadings and adversary proceedings, including the Debtor's Contempt Motion and the

implications of the TRO violation; (iv) preparing for and participating in depositions and Court hearings, and (v) monitoring, assessing and participating in various adversary and appeals proceedings on behalf of the creditors and creditor-constituents.

(k) Plan and Disclosure Statement – Category No. 15

Monthly Fee Period: 260.80 hours; \$299,417.50
Final Fee Period: 2,200.80 hours; \$2,355,776.00

31. This matter category includes time spent by Sidley attorneys related to the review, analysis and negotiation surrounding the terms of the Debtor's Plan and effective date conditions, litigation trust agreement and related issues, as well as overall investigation into and strategy regarding the Debtor's emergence. This matter category also includes time spent reviewing and analyzing pleadings relating to the appeal of the confirmation order, as well as time spent researching and drafting responses in furtherance of same. Sidley attorneys utilized this matter category for time spent assessing liquidity needs for the Plan's effectiveness, D&O policy issues, and proposals to purchase the Debtor's assets. Further, Sidley attorneys assessed, advised the Committee on, and responded to various motions and issues relating to the various requests for a stay pending appeal of the confirmation order. This matter also includes time spent by Sidley attorneys drafting and negotiating key documents needed to effectuate the Plan and to ensure the proper functioning of the post-reorganized Debtor as well as developing strategies related to the same.

(l) Tax – Category No. 21

Monthly Fee Period: 5.70 hours; \$8,137.50
Final Fee Period: 57.10 hours; \$85,748.50

32. This matter category includes Sidley attorneys' review and analysis of the tax implications of certain transactions and the Plan, as well as time spent conferring with the Committee's financial advisors to assess certain audits and tax claims.

(m) Creditor Communications – Category No. 24

Monthly Fee Period: 5.10 hours; \$6,745.50
Final Fee Period: 194.30 hours; \$241,927.00

33. This matter category includes time spent by Sidley attorneys communicating with individual unsecured creditors and their respective counsel (both members of the Committee and non-members) regarding the status of specific motions, discovery and Plan-related issues, as well as the status of the case generally.

ACTUAL AND NECESSARY EXPENSES

34. Attached hereto as Exhibit D is a detailed statement of Sidley's out-of-pocket expenses incurred during the Monthly Fee Period, totaling \$36,678.16. The total out-of-pocket expenses incurred during the Final Fee Period is \$211,841.25. These expenses include, but are not limited to, reprographics services, court fees, out-of-town travel expenses, and litigation support vendors.

SIDLEY'S REQUESTED COMPENSATION AND EXPENSE REIMBURSEMENT SHOULD BE ALLOWED

35. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also establishes the following non-exclusive criteria to determine the amount of reasonable compensation to be awarded:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;

- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered towards the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and expertise in the bankruptcy field; and
- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

36. Sidley respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, necessary for and beneficial to the Committee and were rendered to assist the Committee in discharging its statutory duties during the pendency of this Chapter 11 Case. Sidley further believes that its services to the Committee during the Final Fee Period were performed efficiently and in an expert manner and ultimately benefitted the Committee and the Debtor's unsecured creditors, the Debtor, and its estate. Sidley submits that the compensation requested herein is reasonable in light of the nature, extent, and value of Sidley's services to the Committee. Accordingly, the Application should be approved.

RESERVATION OF RIGHTS

37. Sidley reserves the right to modify, amend, or supplement this Application at any time before the hearing on this Application.

NOTICE

38. Pursuant to the Interim Compensation Order, the Monthly and Final Fee Application is being served upon the Notice Parties and all parties that have requested notice in

this Chapter 11 case pursuant to Bankruptcy Rule 2002. Sidley submits that, in light of the nature of the relief requested, no other or further notice need be given.

[Remainder of page intentionally left blank]

WHEREFORE, Sidley respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit A, (a) approving the Twenty-First Monthly and Final Fee Application; (b) granting allowance and approval of compensation for Sidley's services to the Committee for the Monthly Fee Period in the amount of \$854,259.75, and reimbursement of expenses that Sidley incurred during the Monthly Fee Period in the amount of \$36,678.16; (c) granting final allowance and approval of compensation payments for Sidley services to the Committee during the Final Fee Period in the amount of \$13,134,805.20 and reimbursement of expenses that Sidley incurred during the Final Fee Period in the amount of \$211,841.25; (d) authorizing and directing the Reorganized Debtor to pay Sidley all the foregoing fees and expenses (including any unpaid holdback payments relating to prior monthly fee applications), less any amounts the Debtor or Reorganized previously paid to Sidley on account of such amounts, and (d) grant such other and further relief this Court may deem just and proper.

Dated: October 8, 2021

Respectfully submitted,

SIDLEY AUSTIN LLP

/s/ Juliana L. Hoffman

Matthew A. Clemente (admitted *pro hac vice*)
Dennis M. Twomey (admitted *pro hac vice*)
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-and-

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Counsel For the Official Committee of Unsecured Creditors

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Reorganized Debtor.

Chapter 11

Case No. 19-34054-sgj11

**ORDER GRANTING TWENTY-FIRST MONTHLY AND FINAL FEE APPLICATION OF
SIDLEY AUSTIN LLP, ATTORNEYS FOR THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, FOR COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE MONTHLY FEE PERIOD FROM JULY 1, 2021 THROUGH AND
INCLUDING AUGUST 11, 2021 AND THE FINAL FEE PERIOD FROM
OCTOBER 29, 2019 THROUGH AND INCLUDING AUGUST 11, 2021**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Upon consideration of the application (“Application”)² of Sidley Austin LLP (“Sidley”) for allowance of compensation for professional services rendered in the above captioned Chapter 11 Case during the period from July 1, 2021 through and including August 11, 2021 (the Monthly Fee Period”), and October 29, 2019 through and including August 11, 2021 (the “Final Fee Period”), it is HEREBY ORDERED THAT:

1. Sidley is granted allowance of compensation in the amount of \$854,259.75 for the Twenty-First Monthly Fee Period.
2. Sidley is granted allowance of reimbursements for expenses incurred in the amount of \$36,678.16 for the Twenty-First Monthly Fee Period.
3. Sidley is granted final allowance and approval for compensation in the amount of \$13,134,805.20 for the Final Fee Period.
4. Sidley is granted final allowance and approval for reimbursement of expenses in the amount of \$211,841.25 for the Final Fee Period.
3. The Reorganized Debtor is authorized and directed to remit payment to Sidley of such allowed compensation and expense reimbursement amounts (including any unpaid holdback payments from prior monthly fee applications), less any and all amounts previously paid on account of such fees and expenses.
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

End of Order # #

² Each capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Application.

Exhibit B

Clemente Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Reorganized Debtor.

Chapter 11

Case No. 19-34054-sgj11

**Objection Deadline: October 29, 2021 at 5:00 p.m.
(CT)
Hearing Date: TBD**

DECLARATION OF MATTHEW A. CLEMENTE IN SUPPORT OF THE TWENTY-FIRST MONTHLY AND FINAL FEE APPLICATION OF SIDLEY AUSTIN LLP, ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE MONTHLY FEE PERIOD FROM JULY 1, 2021 THROUGH AND INCLUDING AUGUST 11, 2021 AND FOR THE FINAL FEE PERIOD FROM OCTOBER 29, 2019 THROUGH AND INCLUDING AUGUST 11, 2021.

I, Matthew A. Clemente, being duly sworn, state the following under penalty of perjury:

1. I am a partner of the law firm Sidley Austin LLP ("Sidley" or the "Firm") located

at One South Dearborn Street, Chicago, Illinois 60603.

2. I have reviewed the foregoing twenty-first and final fee application of Sidley for compensation as attorneys for the Official Committee of Unsecured Creditors (the "Application").²

To the best of my knowledge, information and belief, the statements contained in the Application are true and correct.

3. The following statement is provided in response to the questions set forth in paragraph C.5 of the U.S. Trustee Guidelines:

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

- a. As previously disclosed, Sidley and the Committee agreed to ten percent (10%) reduction of Sidley's standard hourly billing rates for this engagement.
 - b. The fees requested in the Application were not higher by 10% or more than the fees budgeted for the period from June 1, 2021 through August 11, 2021 and the Final Fee Period.
 - c. None of the professionals included in the Application varied their hourly rate based on the geographic location of the Debtor's Chapter 11 Case.
 - d. Sidley is not requesting compensation for the review or revision of time records or the preparation, review and revision of invoices that is not related to the preparation of applications for compensation.
 - e. The Application includes 11.20 hours with a corresponding value of \$9,072.50, to ensure that the time entries subject to the period from June 1, 2021 through August 11, 2021, do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Sidley's preparation of each monthly application.
 - f. The Application does include rate increases since the date of Sidley's retention in these chapter 11 cases as particularly noted in the *Application for Employment of Sidley Austin LLP as counsel to the Official Committee of Unsecured Creditors*.
4. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between Sidley and any other entity or person, other than members of the Firm, for the sharing of compensation received or to be received for services rendered in or in connection with this Chapter 11 Case.
5. All professional and paraprofessional services for which Sidley is requesting compensation were rendered solely on behalf of the Official Committee of Unsecured Creditors.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 8, 2021
Chicago, Illinois

/s/ Matthew A. Clemente

Matthew A. Clemente
Sidley Austin LLP

Exhibit C

Time Records

JUNE 2021

**Time Records
from
Twentieth Monthly Fee Application**

Invoice Number: 41041971
 Official Committee of Unsecured

Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
05 Committee Meetings			
06/09/21	T Nifong	Participate in weekly UCC call regarding various issues	.40
06/09/21	MA Clemente	Participate in committee meeting (.4); review materials for same (.1)	.50
06/09/21	J Hoffman	Attend weekly Committee meeting for purpose of taking minutes (0.4); finalize minutes from Committee meeting (0.4)	.80
06/09/21	A Russell	Attend weekly Committee meeting regarding various issues	.40
06/09/21	EA Bromagen	Call with Committee and professionals re various issues	.40
06/09/21	PH Montgomery	Call with UCC regarding various issues	.40
06/09/21	PP Reid	Participate in UCC call regarding various issues	.40
06/23/21	R Fink	Participate in and take minutes on weekly UCC call	.40
06/23/21	MA Clemente	Participate in committee meeting (.4); prepare materials for same (.2)	.60
06/23/21	A Russell	Attend weekly Committee meeting.	.40
06/23/21	EA Bromagen	Call with Committee and advisors re various issues	.40
06/23/21	PP Reid	Participate in committee call regarding various case issues	.40
Task Subtotal			5.50
07 Case Administration			
06/01/21	EA Bromagen	Review Debtor's Motion for CEO bonus and email to M. Clemente re same (.5); emails with M. Clemente and E. Cheng re call with Committee (.2)	.70
06/01/21	DJ Lutes	Review docket and correspondence from Sidley team for case status, filings, orders and deadlines	.30
06/02/21	J Hoffman	Research re: Fifth Circuit appeal order (0.1); correspondence with E. Bromagen re: same (0.1)	.10
06/02/21	MA Clemente	Call with E. Bromagen re: various issues (.4); assess committee issues (.7)	1.10
06/02/21	EA Bromagen	Discussions with M. Clemente re status of various issues (.4); emails with E. Cheng re same (.1); emails with M. Clemente re debtor's motion for CEO bonus (.1)	.60
06/02/21	A Russell	Review, analyze Committee update in lieu of weekly Committee call.	.20

Invoice Number: 41041971
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
06/04/21	J Hoffman	Update case calendar (0.1); confer with D. Lutes re: future fee applications (0.1); correspondence with Pachulski re: UCC adversary transcript (0.1)	.30
06/07/21	DJ Lutes	Review incoming correspondence, pleadings or orders from Sidley team for case updates and status	.30
06/07/21	EA Bromagen	Call with FTI and Sidley re various issues (.4); review order holding Dondero in contempt of court and email to Committee re same (.4)	.80
06/07/21	J Hoffman	Update case calendar (0.1); correspondence with A. Russell re: contempt hearing (0.1)	.20
06/07/21	MA Clemente	Team call with FTI and Sidley team re: various issues (.5); conference with J. Seery re: various issues (.4)	.90
06/07/21	A Russell	Telephone conference (in part) with Sidley and FTI teams re current case issues.	.40
06/08/21	J Hoffman	File CNO and upload order for Teneo retention	.20
06/09/21	DJ Lutes	Review case docket for case status, pending orders and new filings	.10
06/09/21	CM Rognes	Attend pre-UCC call with Sidley and FTI	.30
06/09/21	EA Bromagen	Call with Sidley and FTI teams re various issues (.3); draft and email agenda to Committee (.1); review various filings re financing motion, contempt motions (.3); call with E. Cheng re various issues (.1); review reports of contempt hearing and email to M. Goldman re case status (.1)	.90
06/09/21	MA Clemente	Email with E. Bromagen re: committee agenda (.1); prepare for committee meeting (.6); call with FTI and Sidley team regarding committee issues (.3)	1.00
06/09/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting.	.30
06/10/21	EA Bromagen	Discuss various issues with G. Demo (.2); emails to M. Clemente, A. Russell re status of motion to reconsider CEO order (.2); review of filings re motion to reconsider CEO order (.5)	.90
06/10/21	J Hoffman	Update case calendar	.10
06/10/21	MA Clemente	Email with J. Pomerantz re: upcoming hearing (.1); update email from E. Bromagen re: CEO modification motion (.2)	.30
06/11/21	EA Bromagen	Discuss updates on various issues with E. Cheng (.2); emails with M. Clemente re update on various issues (.2)	.40
06/11/21	MA Clemente	Update email from E. Bromagen re: various issues	.30

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Date	Name	Narrative	Hours
06/11/21	J Hoffman	Correspondence with E. Bromagen re: hearing transcripts (0.1); review Teneo retention order (0.1)	.20
06/14/21	MA Clemente	Team call with FTI regarding various issues	.50
06/14/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues (.5); correspond with Pachulski re rescheduling of 6/11 hearing (.1).	.60
06/14/21	J Hoffman	Update case calendar (0.1); research in connection with the contempt order (0.2)	.30
06/14/21	EA Bromagen	Call with Sidley and FTI teams (in part) re various issues	.40
06/15/21	MA Clemente	Call with counsel for Dondero (.7); emails with E. Bromagen re: financing (.3)	1.00
06/15/21	EA Bromagen	Emails with R. Fink re case calendar (.1); review of same (.2); emails with M. Clemente re deadlines (.1)	.40
06/16/21	J Hoffman	Review, analyze exit finance term sheet (0.2); confer with Sidley team, committee re: same (0.1)	.30
06/16/21	MA Clemente	Email to Committee re: call (.1); email with E. Bromagen re: committee meeting (.1); analysis of developments for potential committee discussion (.5)	.70
06/16/21	A Russell	Review, analyze weekly update to Committee in lieu of call.	.20
06/16/21	EA Bromagen	Emails with R. Fink, J. Hoffman re filings and committee call scheduling	.20
06/21/21	A Russell	Telephone conference (in part) with Sidley and FTI teams re current case issues.	.30
06/21/21	MA Clemente	Team call with FTI regarding various case issues (.5); call with E. Bromagen re: various issues (.2)	.70
06/21/21	EA Bromagen	Call (in part) with FTI and Sidley teams re various issues	.30
06/22/21	DM Twomey	Correspond with M. Clemente regarding case developments, UCC composition changes, financing and related issues	.30
06/22/21	J Hoffman	Draft, file CNO for fee application (0.3); confer with Sidley team re: depositions (0.1)	.40
06/22/21	EA Bromagen	Call with M. Clemente re various issues (.4); draft agenda and email to Committee re same (.2)	.60
06/23/21	MA Clemente	Team call with FTI re: various issues (.4); prepare for committee call (1.0); call with E. Bromagen re: various issues (.3)	1.70
06/23/21	A Russell	Telephone conference with Sidley and FTI teams to prepare and coordinate for Committee meeting.	.40

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Date	Name	Narrative	Hours
06/23/21	EA Bromagen	Call with FTI and Sidley team re committee call (.4); preparation for committee call (.3)	.70
06/24/21	R Fink	Revise and synthesize meeting minutes regarding Committee meeting 6/24	.20
06/24/21	MA Clemente	Call with J. Pomerantz re: various issues	.30
06/24/21	EA Bromagen	Discuss various issues with M Clemente	.20
06/25/21	DM Twomey	Correspond with M. Clemente regarding hearing update, case issues (.20); review emails regarding indemnity trust (.10)	.30
06/25/21	MA Clemente	Call with M. Kirschner re: various issues (.3); email with P. Montgomery re: call with Kirshner (.1)	.40
06/28/21	DJ Lutes	Research case docket for deadlines and notices (.2); prepare electronic files for Sidley team regarding same (.2)	.40
06/28/21	MA Clemente	Update from E. Bromagen on FTI call (.2); review agenda issues from FTI (.3)	.50
06/28/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.30
06/28/21	EA Bromagen	Call with Sidley and FIT teams re various issues	.30
06/30/21	MA Clemente	Call with E. Bromagen re: various issues	.40
06/30/21	EA Bromagen	Discuss various issues with M Clemente	.40
		Task Subtotal	24.60
		11 Retention	
06/08/21	J Hoffman	Draft CNO and order for Teneo retention	.30
06/28/21	MA Clemente	Address M. Kirschner emails re: fee applications	.30
06/29/21	MA Clemente	Address issues regarding Kirschner fee apps	.50
06/30/21	EA Bromagen	Discuss Teneo retention applications with K Bhavaraju	.10
		Task Subtotal	1.20
		12 Fee Applications	
06/01/21	DJ Lutes	Review May monthly fee application materials and costs	.40
06/01/21	J Hoffman	Finalize and file fee application	.20
06/02/21	DJ Lutes	Prepare interim fee application spreadsheet materials (.9); emails with S. Caputo regarding monthly fee applications (.1); prepare electronic files from docket for same (.2)	1.20
06/03/21	DJ Lutes	Prepare interim fee application materials, charts and exhibits (2.5); prepare monthly fee application materials and exhibits (1.9)	4.40

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Date	Name	Narrative	Hours
06/04/21	DJ Lutes	Prepare monthly fee application materials (4.4); emails with J. Hoffman regarding effective date (.1); emails with S. Caputo regarding monthly materials (.2); review interim fee application materials, timing and spreadsheets (.5)	5.20
06/07/21	DJ Lutes	Prepare monthly fee application materials and exhibits (3.1); review cost materials for compliance (.4); review interim fee application materials, timing and spreadsheets (.2)	3.70
06/08/21	DJ Lutes	Prepare monthly fee application materials and exhibits (3.8); review cost materials for compliance (.3); prepare spreadsheets for interim fee application (.3)	4.40
06/09/21	DJ Lutes	Prepare monthly fee application materials and exhibits	.30
06/10/21	DJ Lutes	Prepare monthly fee application materials (1.2); emails with S. Caputo regarding same (.1)	1.30
06/11/21	DJ Lutes	Prepare monthly fee application materials and exhibits	1.30
06/14/21	DJ Lutes	Emails with P. Foley regarding privilege review (.1); prepare materials for same (.1); email S. Caputo regarding same (.1)	.30
06/15/21	DJ Lutes	Prepare monthly fee application materials and exhibits (1.0); email to S. Caputo regarding payment status (.1)	1.10
06/17/21	DJ Lutes	Email to P. Foley regarding privilege review	.10
06/21/21	DJ Lutes	Prepare monthly fee application materials (.5); emails with M. Morrison regarding same (.2)	.70
06/22/21	DJ Lutes	Prepare monthly fee application materials (.8); emails with M. Morrison regarding same (.1); email to M. Clemente and J. Hoffman regarding same (.1)	1.00
06/28/21	DJ Lutes	Emails to M. Clemente and J. Hoffman regarding fee application issues (.2); review interim fee application materials, issues and deadlines (.4);	.60
06/28/21	J Hoffman	Discuss fee application issues with D. Lutes	.20
06/28/21	EA Bromagen	Emails with M. Kirschner re Teneo fee applications	.40
06/29/21	DJ Lutes	Emails with J. Hoffman regarding monthly and interim fee application issues	.10
06/29/21	J Hoffman	Conduct privilege review of FTI fee application (0.3); correspondence with FTI team re: same (0.1)	.40
06/30/21	DJ Lutes	Emails with M. Clemente and J. Hoffman regarding interim fee application notice (.2); prepare interim fee application, materials and exhibits (5.4)	5.60
06/30/21	MA Clemente	Review current fee app	.60
Task Subtotal			33.50

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Date	Name	Narrative	Hours
13 Financing and Cash Collateral			
06/16/21	A Russell	Review, analyze FTI questions re exit financing term sheet (.2); correspond with Sidley and FTI teams re same (.2)	.40
			Task Subtotal
			.40
14 Litigation			
06/01/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails to E. Bromagen and FTI re- same (.1)	.30
06/01/21	T Nifong	Correspond with P. Montgomery re: investigating cross trade materials	.20
06/01/21	CM Rognes	Correspond with P. Montgomery re: priority custodians (0.1); correspond with P. Montgomery re: document collection (0.2)	.30
06/01/21	MA Clemente	Participate in Dondero deposition (2.5); analysis of various cross trade materials and documents for potential claims and causes of action (2.2)	4.70
06/01/21	PH Montgomery	Attend J. Dondero and L. Scott depos (5.7); review cross-trade information (1.9); conference with T. Nifong regarding same (.2)	7.80
06/01/21	A Russell	Attend and observe deposition of J. Dondero on behalf of Committee.	2.50
06/02/21	MA Clemente	Work on 2004 strategy (1.2); call with P. Montgomery regarding same (.3)	1.50
06/02/21	MA Clemente	Call with M. Kirschner re: various issues	.40
06/02/21	PH Montgomery	Call with M. Clemente regarding scheduling issues and tasks (.3); communications with B. Sharp regarding document collection (.1); review of documents related to estate claims and team communications on same (3.1)	3.50
06/03/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.10
06/03/21	CM Rognes	Correspond with P. Montgomery re: document access (0.3); correspond with DSI re: document access (0.2); correspond with litigation support re: document collection (0.1); correspond with P. Montgomery re: document collection (0.1); document review (0.1)	.80
06/03/21	PP Reid	Emails with Sidley team regarding CLO Holdco adversary proceeding	.50
06/03/21	MA Clemente	Read numerous reference withdrawal papers (1.0); work on 2004 strategy (1.5)	2.50

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Date	Name	Narrative	Hours
06/03/21	PH Montgomery	Calls with C. Rognes regarding discovery issues (.2); communications with C. Rognes regarding data collection (.3); review documents related to cross trade (3.7)	4.20
06/04/21	CM Rognes	Draft Rule 2004 motion	1.20
06/04/21	PP Reid	Participate (in part) in depo of Mark Patrick	2.50
06/04/21	MA Clemente	Participate in M. Patrick deposition (3.0); brief review of Grant Scott transcript (.5)	3.50
06/04/21	A Russell	Attend and observe deposition of M. Patrick re contempt hearing (3.0); correspond with Sidley litigation team re same (.2); review, analyze Dondero objection to motion to extend removal deadline (.2)	3.40
06/07/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails to FTI and E. Bromagen re- same (.1)	.30
06/07/21	PP Reid	Participate in call with FTI and Sidley teams regarding UCC call (.5); emails from Sidley team regarding discovery from debtor (.8)	1.30
06/07/21	CM Rognes	Attend professional call with Sidley and FTI regarding various issues (0.5); draft Rule 2004 motion (0.6); research re: Rule 2004 motions (2.2); correspond with DSI re: document production (0.2); review contempt order (0.3); correspond with P. Montgomery re: document production (0.3)	4.10
06/07/21	DM Twomey	Phone conference with M. Clemente regarding update, upcoming hearing and strategy (.10); review/analyze ruling on contempt motion (1.3)	1.40
06/07/21	J Hoffman	Review, analyze opinion on Dondero TRO violation (0.2); correspondence with Sidley team re: same (0.1); prepare hearing materials for Sidley team for Contempt hearing (0.4)	.70
06/07/21	MA Clemente	Review materials for contempt hearing (1.0); read and analysis of contempt ruling (1.0); email with E. Bromagen re: contempt ruling (.1)	2.10
06/07/21	PH Montgomery	Preparation call with FTI and Sidley teams regarding UCC call (.5); communications with M. Kirschner regarding order on motion for contempt (.1) review same (.5); review cross trade data (3.7); prepare for hearing and related communications (.6)	5.40
06/07/21	A Russell	Review, analyze memorandum opinion finding J. Dondero in contempt.	.70
06/08/21	CM Rognes	Attend contempt hearing (in part) (1.0); research re: trustee (0.8); document review re: articles of incorporation (0.6); research re: Rule 2004 (0.8); draft Rule 2004 motion (0.9); correspond with litigation support re: document collection	4.40

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Date	Name	Narrative	Hours
		(0.2); correspond with P. Montgomery re: document collection (0.1)	
06/08/21	PP Reid	Participate in the hearing (in part) on extensions to remove and contempt	7.20
06/08/21	EA Bromagen	Attend hearing (in part) re contempt of court for violation of CEO order	7.40
06/08/21	J Hoffman	Attend (in part) hearing on the Contempt Motion	6.00
06/08/21	MA Clemente	Participate in sanctions hearing (9.5); prepare for hearing (1.0); emails re: Kirschner retention (.2)	10.70
06/08/21	PH Montgomery	Attend hearing on motion for sanctions (9.5); related communications/preparations for same (.7)	10.20
06/08/21	A Russell	Attend (virtually) hearing (in part) to find Sbaiti firm, Dondero, and other entities in contempt re Seery complaint and review pleadings for same.	7.90
06/08/21	PH Montgomery	Call with C. Rognes re preparations for document collection	.10
06/09/21	CM Rognes	Document collection at Debtor	9.50
06/09/21	T Nifong	Participate in weekly Sidley/FTI pre-UCC call	.30
06/09/21	T Nifong	Confer with P. Montgomery re: third letter to Bonds Ellis	.10
06/09/21	MA Clemente	Call with M. Kirschner re: various issues (.4); call with P. Montgomery re: strategy (.4); communications with P. Montgomery re: information gathering (.3)	1.10
06/09/21	PP Reid	Participate in professional call with FTI and Sidley teams regarding various issues (.3); review emails and materials from Sidley team regarding issues for UCC (.3)	.60
06/09/21	PH Montgomery	Collect documents at Debtor including calls with M. Clemente regarding strategy (9.7); calls with M. Clemente regarding information gathering (.3)	10.00
06/09/21	PH Montgomery	Call with M. Kirschner regarding strategic issues	.40
06/10/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
06/10/21	CM Rognes	Correspond with Debtor re: document requests (0.1); correspond with T. Nifong re: document review (0.1)	.20
06/10/21	J Hoffman	Attend hearing on motions for leave	2.20
06/10/21	PP Reid	Participate (in part) in NexPoint's motion for leave	1.50
06/10/21	MA Clemente	Participate in hearing regarding 2015.3 and adversary amendments (2.2) prepare for hearing (.7); call with P. Montgomery re: strategy (.1); emails to P. Montgomery regarding same (.2); emails with A. Russell re: upcoming	5.10

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Date	Name	Narrative	Hours
		hearing (.2); review filings in UBS litigation (.3); work on 2004 strategy (1.4)	
06/10/21	PH Montgomery	Call with M. Clemente re status issues	.10
06/10/21	A Russell	Correspond with E. Bromagen and M. Clemente re preparation for 6/11 hearing.	.30
06/10/21	A Russell	Attend hearing on motions of Dondero entities for leave to amend answers in promissory note adversary proceedings.	2.20
06/10/21	T Nifong	Correspond with C. Rognes re: investigating communications (.2); investigate communications in relativity database (6.4); confer with M. Wolf re: limiting email searches (.1); emails with P. Montgomery and C. Rognes re: investigating communications (.4); correspond with P. Montgomery re: investigating communications (.1)	7.20
06/11/21	T Nifong	Investigate litigation issues between Highland entities	3.80
06/11/21	MA Clemente	Emails with P. Montgomery and P. Reid re: strategy (.3); review first amended complaint (.5); work on 2004 strategy (1.7)	2.50
06/12/21	CM Rognes	Draft document collection summary	.50
06/13/21	CM Rognes	Draft objections re: document requests (1.8); draft talking points re: investigation call (1.3)	3.10
06/14/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails to FTI and E.Bromagen re- same (.1)	.30
06/14/21	PP Reid	Participate in call with FTI and Sidley team regarding various issues (.5); call with team regarding litigation trustee (.3); emails with team regarding same (.2); telephone conference with counsel regarding obtaining documents from Debtor (.4)	1.40
06/14/21	MA Clemente	Call with P. Montgomery and P. Reid re: litigation issues (.3); call with P. Montgomery and M. Kirschner re: various issues (.3); review 5th Circuit plan appeal papers (.8); call with P. Montgomery re: follow up with M. Kirschner (.3); address Kirschner materials (.4)	2.10
06/14/21	PH Montgomery	Call with P. Reid and M. Clemente regarding document issues (.3); calls with M. Kirschner re same (1.5); review and revise talking points re investigation status (.6); call with FTI regarding weekly meeting (.5); review of documents collected related to trust actions (3.9); confer with J. Hoffman regarding discovery motions (.3); communications with M. Deegan re document issues (.2)	7.30
06/14/21	CM Rognes	Draft agenda re: call with Teneo (1.0); attend professionals call with Sidley and FTI (0.5); document collection (0.1); draft	6.20

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Date	Name	Narrative	Hours
06/14/21	M Abdul-Jabbar	Rule 2004 motion (1.8); document review (0.4); correspond with Teneo and team re: document issues and next steps (1.4); correspond with P. Montgomery re: Rule 2004 motions (0.4); correspond with M. Abdul-Jabbar, J. Hoffman, and T. Nifong re: Rule 2004 motions (0.6)	
06/14/21	M Abdul-Jabbar	Review draft 2004 examination motion and draft related requests for production relating to Hunter Mountain transaction parties	3.20
06/14/21	M Abdul-Jabbar	Analyze requests for production and draft deposition topics in connection with 2004 examination (1.5); call with Sidley team regarding same (.6)	2.10
06/14/21	J Hoffman	Confer with P. Montgomery re: discovery motions (0.3); call with Sidley litigation team to discuss strategy for discovery motions (0.6); draft declaration in support of discovery motions (0.7); review documents in connection with same (0.4)	2.00
06/14/21	T Nifong	Draft UCC 2004 requests for production and deposition topics (1.9); research re: HCMLP v. Daughterly (.2); call with M. Abdul-Jabbar, J. Hoffman, and C. Rognes re: Committee 2004 requests (.6); correspond with C. Rognes re: issue tags in relativity (.1)	2.80
06/15/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.1); emails to Sidley team regarding same (.1)	.20
06/15/21	PP Reid	Emails with Sidley team regarding litigation trustee	.50
06/15/21	MA Clemente	Review and revise potential work allocation (.5); emails with P. Montgomery re: Kirschner requests (.2) email from P. Montgomery re: FTI (.1); read Dondero emergency motion (.4)	1.20
06/15/21	PH Montgomery	Call with FTI re work streams (.2); review and revise scope of work document (.5); review and revise draft email regarding document requests (.5); communications with T. Nifong re discovery issues (.4); review of documents identified by team (1.4)	3.00
06/15/21	CM Rognes	Document review (0.5); draft Rule 2004 motion (2.0); draft responses to requests for production (0.7)	3.20
06/15/21	A Russell	Correspond with C. Rognes re litigation material requests from M. Kirschner.	.20
06/15/21	M Abdul-Jabbar	Revise 2004 requests and deposition topics	.50
06/15/21	J Hoffman	Revise declaration (0.2); review, revise discovery motions (0.2)	.40
06/15/21	T Nifong	Investigate historical flows of payments on Hunter Mountain note (.3); correspond with P. Montgomery and C. Rognes re: document investigation requests (.1); correspond with C.	2.90

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Date	Name	Narrative	Hours
		Rognes re: research Rule 2004 subpoena distance requirements (.1); research Rule 2004 subpoena distance requirements (.5); correspond with C. Rognes re: UCC 2004 deposition topics (.1); investigate transfers to related entities data (.6); review UCC 2004 examination documents (.9); correspond with M. Abdul-Jabbar, J. Hoffman, and C. Rognes re: UCC 2004 examination documents (.1); prepare documents for FTI team (.2)	
06/16/21	T Nifong	Investigate cross trades between Debtor related entities	1.20
06/16/21	CM Rognes	Draft responses to discovery requests (1.0); correspond with P. Montgomery re: response strategy (0.1)	1.10
06/16/21	M Abdul-Jabbar	Work on 2004 examination motion, requests for production and related deposition topics (.8); analyze documents in production relating to specific issues (.7); confer with P. Montgomery relating to attorney analysis re: same (1.1)	2.60
06/16/21	PH Montgomery	Review and revise Rule 2004 motion, affidavit, RFPs and 30b6 topics (5.1); review of documents related to Hunter Mountain transaction (3.5) ; call with MAJ re 2004 issues (1.1); evaluate 2004 issues (1.0); correspond with C. Rognes re document request issues (.2); communications with J. Hoffman re exit financing motion (.1)	11.00
06/16/21	MA Clemente	Assess 2004 topics	1.30
06/17/21	CM Rognes	Correspond with DSI re: collection (0.1); correspond with P. Montgomery re: collection (0.1)	.20
06/17/21	M Abdul-Jabbar	Revise draft Hunter Mountain 2004 motion, requests for production and deposition topic materials (1.6); confer with Sidley team re: same (.5); correspond with T. Nifong regarding same (.3)	2.40
06/17/21	PH Montgomery	Review and revise Rule 2004 discovery (4.5); communications with team re transactions for investigation (.5); communications with K. Bhavaraju re discovery (.2); draft summary of Hunter Mountain transaction (3.2)	8.40
06/17/21	MA Clemente	Continued analysis of Hunter Mountain materials (1.9); address detailed emails from P. Montgomery re: Hunter Mountain (.6); emails regarding upcoming depositions (.2); review draft 2004 papers (1.1); review court order re: Dugaboy (.2)	4.00
06/17/21	T Nifong	Draft 2004 examination motion and RFPs (3.3); correspond with P. Montgomery, C. Rognes, M. Abdul-Jabbar, and J. Hoffman re: 2004 motion and RFPs (.1); correspond with P. Montgomery re: 2004 Motion and RFPs (.2); correspond with M. Abdul-Jabbar re: 2004 Motion and RFPs (.3)	3.90
06/18/21	CM Rognes	Revise objections to discovery response (0.2); correspond with	2.40

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Date	Name	Narrative	Hours
06/18/21	M Abdul-Jabbar	P. Montgomery, M. Abdul-Jabbar, M. Clemente, and S. Advani re: transactions (0.9); correspond with P. Montgomery and M. Abdul-Jabbar re: Rule 2004 (1.0); document review (0.2); correspond with P. Montgomery re: discovery responses (0.1)	
06/18/21	PH Montgomery	Participate in litigation strategy call with M. Clemente, P. Montgomery, and S. Advani (.9); analyze transfers out of debtor entity (.4); confer with P. Montgomery and C. Rognes regarding outstanding 2004 requests and work plan re: same (1.0)	2.30
06/18/21	MA Clemente	Calls with MAJ, C. Rognes and S. Advani re investigation topics (1.9); call with M. Clemente re discovery and Rule 2004 (.5); review of documents obtained in collection (3.2)	5.60
06/18/21	T Nifong	Call with P. Montgomery and S. Advani re: Hunter Mountain (.9); call with P. Montgomery re: various issues (.5); analysis of various theories re: pre-petition transactions (2.1)	3.50
06/19/21	CM Rognes	Investigate discovery issue (.3); correspond with P. Montgomery re: same (.1)	.40
06/20/21	CM Rognes	Correspond with P. Montgomery re: discovery requests	.10
06/20/21	PH Montgomery	Update document collection log (0.2); revise rule 2004 motion (0.2); revise 2004 declaration (0.1); correspond with FTI re: document collection (0.1)	.60
06/21/21	C Clark	Draft outline of discovery issues including related communications with team	1.20
06/21/21	CM Rognes	Online research to locate registered agent for multiple entities	1.60
06/21/21	PH Montgomery	Revise objections to discovery requests (0.7); correspond with opposing counsel re: discovery request objections (0.1); research re: signature rule (0.2); correspond with P. Montgomery re: discovery objections (0.3); correspond with Debtor re: document collection (0.1); correspond with litigation support re: document collection (0.1); on site document collection (6.8)	8.30
06/21/21	PP Reid	Participate at document collection at the debtor (6.0); call with C. Rognes re preparations for same (.2); analysis of payments related to debtor transfer of cash and begin draft summary of same (1.3); correspond with MAJ regarding flow of funds (.2); review and revise objections and responses to subpoena and communications with C. Rognes re same (1.4)	9.10
06/21/21	M Abdul-Jabbar	Participate in telephone conference with FTI and Sidley tema regarding various issues (.5); emails with team regarding documents for litigation trustee (.3)	.80
06/21/21		Correspond with P. Montgomery regarding Hunter Mountain	.20

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Date	Name	Narrative	Hours
06/21/21	J Hoffman	flow of funds	.20
06/21/21	BE Cole	Attend hearing on Dondero's emergency motion	.40
06/21/21	A Russell	Research registered agent info for subpoena purposes for C. Clark.	
06/21/21	MA Clemente	Attend hearing on J. Dondero's motion to stay contempt order pending appeal	.20
06/21/21	PG Foley	Participate in emergency hearing (.2); review draft objection to discovery (.5); emails with P. Montgomery and C. Rognes re draft objection (.2); analysis of objections to discovery requests directed to the committee (.9); address emails from J. Hoffman re: depositions (.2); analysis of detailed email from P. Montgomery re: various transactions (.5)	2.50
06/21/21	T Nifong	Privilege-related review of May invoice (3.2); correspondence with D. Lutes regarding same (.1)	3.30
06/21/21	R Fink	Draft 2004 priorities document (.8); correspond with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: draft 2004 priorities document (.1); investigate discovery re: Hunter Mountain (.3); confer with C. Rognes re: research for objections to document responses (.1); research re: objections to document responses for committee (.6); draft UCC response to CPCM request for production (.3); correspond with C. Rognes re: draft UCC response to CPCM request for production (.1); correspond with P. Montgomery re: investigate discovery re: Hunter Mountain (.1); correspond with M. Abdul-Jabbar re: Rule 2004 RFPs and motions (.1)	2.50
06/22/21	CM Rognes	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails to E. Bromagen and FTI re- same (.1)	.30
06/22/21	PH Montgomery	Draft discovery tracker (0.9); draft master issue list re: discovery (1.5); update document collection log (0.3); correspond with M. Abdul-Jabbar and T. Nifong re: discovery strategy (0.8); prepare discovery strategy for Sidley team with P. Montgomery (0.9); correspond with P. Montgomery, M. Abdul-Jabbar, and T. Nifong re: discovery strategy (1.3); draft discovery topics (2.4); correspond with P. Montgomery re: document collection (0.4); correspond with e-discovery vendor re: document collection (0.1); correspond with T. Nifong re: document collection (0.1); document review (0.2)	8.90
06/22/21		Prepare discovery strategy with C. Rognes (.9); call with MAJ, C. Rognes and T. Nifong re 2004 requests (.6); call with C. Rognes re document collection issues (.4); communications with M. Kirschner re 2004 requests (.4); communications with B. Sharp re document requests (.3); draft summary of cash	6.00

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Restructuring

Date	Name	Narrative	Hours
06/22/21	M Abdul-Jabbar	flows re transaction, including document review re same (3.4) Revise master issues list, summary descriptions, and Rule 2004 tracking information in connection with 2004 examination proceedings	4.30
06/22/21	M Abdul-Jabbar	Confer with C. Rognes and T. Nifong regarding 2004 examinations, draft requests and deposition topics (2.1); revise draft deposition topics (1.0)	3.10
06/22/21	MA Clemente	Read Dugaboy supplemental objection to financing (.5); email from E. Bromagen re: information requests (.1); emails with P. Montgomery re: information requests (.3); analysis of funds flow in various transactions (.7)	1.60
06/22/21	EA Bromagen	Review of diligence requests from Sidley team (.3); emails with C. Rognes, P. Montgomery re same (.2)	.50
06/22/21	T Nifong	Draft Hunter Mountain group Rule 2004 RFPs and topics (.5); call with P. Montgomery, C. Rognes, M. Abdul-Jabbar re: Rule 2004 plan (1.3); correspond with M. Abdul-Jabbar and C. Rognes re: Rule 2004 master issue list, topics, and RFPs (.6); draft Rule 2004 master issue list (3.2); correspond with C. Rognes re: document collection at Debtor (.1); draft Rule 2004 master excel document (.4); correspond with M. Abdul-Jabbar and C. Rognes re: Rule 2004 master topics list (.3); draft Rule 2004 master topics list (2.4); correspond with C. Rognes re: draft Rule 2004 master topics list (.2); call with M. Abdul-Jabbar and C. Rognes re: drafting Rule 2004 motions, declaration, RFPs, and deposition topics (.8);	9.80
06/23/21	CM Rognes	Draft discovery topics (0.4); participate in document collection (10.0); correspond with P. Montgomery and T. Nifong re: document collection (0.3); correspond with FTI re: document collection (0.1); revise document collection log (0.1)	10.90
06/23/21	PP Reid	Participate in professionals call with FTI and Sidley teams regarding committee call (.4); prepare for committee call (.1)	.50
06/23/21	M Abdul-Jabbar	Revise 2004 exam materials and correspond with C. Rognes and T. Nifong regarding updates to litigation trustee	.50
06/23/21	A Russell	Review, analyze briefing re 6/25 hearing.	.60
06/23/21	PH Montgomery	Participate in document collection at Debtor (3.0); call with Teneo re litigation issues (1.2); draft, review, and revise timeline of transaction, including review of related documents (4.0); call with S. Advani regarding same (.3); review and revise issue list and tracker and related communications (1.1)	9.60
06/23/21	T Nifong	Participate at on site document collection and analyzing cross trades (5.8); correspond with C. Rognes re: scanning documents from Debtor (.1); correspond with P. Montgomery	6.50

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Date	Name	Narrative	Hours
06/24/21	CM Rognes	and C. Rognes re: on site document collection and Rule 2004 documents (.3); correspond with P. Montgomery re: documents to add to Hunter Mountain transaction chronology (.1); correspond with C. Rognes re: document collection at Debtor (.1); correspond with M. Abdul-Jabbar and C. Rognes re: Rule 2004 master requests (.1);	
06/24/21	J Hoffman	Update collection log (0.6); update discovery tracker (0.6); review custodian list (0.2); confer with vendor and P. Montgomery re: document collection (0.5); draft discovery topics (0.9); draft requests for production (1.2); correspond with DSI re: document collection (0.1)	4.10
06/24/21	PH Montgomery	Attend (in part) hearing on motion to compel (1.1); confer with P. Montgomery re: discovery motions (0.1); correspondence with A. Russell re: debtor's depositions (0.1)	1.30
06/24/21	PH Montgomery	Call with Meta-E regarding data load	.50
06/24/21	MA Clemente	Participate in hearing regarding motion to quash (2.4); communications with Teneo regarding payment history (.1); review and revise 2004 topics, tracker and issue list (1.6); related communications with Sidley team regarding same (.9)	5.00
06/24/21	M Abdul-Jabbar	Attend hearing regarding employee motion to quash (2.4); analysis of updated 2004 tracker (.5); correspond with P. Montgomery re: documents (.2); review revised 2004 papers (1.4)	4.50
06/24/21	A Russell	Revise 2004 exam master issue sheet	.80
06/24/21	EA Bromagen	Attend hearing on adversary discovery disputes.	2.60
06/24/21	T Nifong	Attend former employee's motion to quash discovery of UBS	2.40
06/24/21	CM Rognes	Correspond with C. Rognes re: document issues from Debtor (.1); correspond with N. Cade re: scanning documents from Debtor (.1); confer with N. Cade and M. Deegan re: scanning documents from Debtor (.1); confer with L. Gonzales re: scanning documents from Debtor (.2); draft master Rule 2004 RFPs (1.9); draft master Rule 2004 topics (2.3); correspond with P. Montgomery and C. Rognes re: scanning for document collection from Debtor (.1); correspond with J. Trent re: onsite document collection at Debtor's offices (.1); correspond with M. Abdul-Jabbar and C. Rognes re: Rule 2004 RFPs (.2); confer with M. Throckmorton re: onsite document collection at Debtor's offices (.1)	5.20
06/25/21	PH Montgomery	Draft discovery topics (0.8); draft cover letter re: document collection (0.1)	.90
06/25/21	PH Montgomery	Attend hearing in part for debtor's exit financing motion	5.00

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Date	Name	Narrative	Hours
06/25/21	PH Montgomery	Review documents related to jurisdictional issues and communications with team regarding same	.50
06/25/21	MA Clemente	Participate in hearings (6.1); read Debtor response to financing objection (.8); email with S. Advani re: various issues (.1); read pleadings to prepare for hearing (1.0)	8.00
06/25/21	J Hoffman	Attend (in part) hearing on exit financing	4.50
06/25/21	A Russell	Attend hearing on motion re exit financing, motion re Seery bonus, and motion to modify CRO retention (6.1); review filed materials re same (1.5)	7.60
06/25/21	EA Bromagen	Attend hearing re financing motion, Seery compensation motion	6.10
06/25/21	T Nifong	Participate in ending committee/litigation advisor requests call (.2); correspond with P. Montgomery and C. Rognes re: cross trade documents (.1); participate in onsite document collection at the Debtor (5.6); confer with J. Donohue re: on site document collection (.1); draft Rule 2004 Master Topics (1.9); confer with DSI re: pending committee/litigation advisor requests call (.1); correspond with P. Montgomery, M. Abdul-Jabbar, and C. Rognes re: jury waiver for motion to withdraw the reference (.1); analyze jury waiver for motion to withdraw the reference (.6); determine documents to be collected on site at Debtor (.2)	8.90
06/26/21	CM Rognes	Update document collection log	.10
06/27/21	T Nifong	Confer with M. Throckmorton re: on site document collection for Monday (.1); confer with J. Trent re: on site document collection for Monday (.1)	.20
06/28/21	CM Rognes	Attend weekly professional call with Sidley and FTI (0.3); review index re: hard copy documents (0.5); revise discovery exam topics (0.7); review discovery issue list (0.1); correspond with the Debtor re: discovery (0.1); correspond with M. Abdul-Jabbar re: exam topics (0.1)	1.80
06/28/21	M Abdul-Jabbar	Revise 2004 exam master issue topics (1.0); correspond with C. Rognes and P. Montgomery regarding same (.1)	1.10
06/28/21	MA Clemente	Analysis of discovery issues (.9); analysis of issues list (1.1); work on Hunter Mountain issues (.9)	2.90
06/28/21	EA Bromagen	Emails with C. Rognes re litigation trust diligence	.10
06/28/21	T Nifong	Correspond with P. Montgomery and C. Rognes re: on site document collection (.1); participate in on site document collection (5.9); correspond with C. Rognes and M. Abdul-Jabbar re: Rule 2004 master topics and RFPs (.1); draft Rule 2004 master topics and RFPs (.3)	6.40

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Date	Name	Narrative	Hours
06/28/21	PH Montgomery	Coordinate document collection (1.1); review and revise issue list (.5); call with FTI and Sidley teams regarding various issues (.3)	1.90
06/29/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30
06/29/21	T Nifong	Participate in on site document collection and review	6.30
06/29/21	CM Rognes	Revise discovery issue chart (0.2); correspond with P. Montgomery re: discovery exam topics (0.1)	.30
06/29/21	MA Clemente	Review strategy call agenda (.3); email with P. Montgomery re: strategy call (.1); address Kirschner emails regarding same (.4)	.80
06/30/21	T Nifong	Participate in on site document collection and review (5.7); participate in tax call with Teneo and Sidley team (1.0)	6.70
06/30/21	CM Rognes	Correspond with P. Montgomery re: exam topics (0.1); correspond with P. Montgomery re: data collection (0.2)	.30
06/30/21	PH Montgomery	Call with M. Clemente and Kirschner regarding litigation trust issues (1.5); review of documents and draft timeline regarding transactions with debtor affiliates (5.2); call with Teneo and Sidley team regarding tax issues (1.0); call with M. Clemente regarding research on transactions (.3); communications with Meta-E regarding document processing (.2); review financial information related to potential claims and communications with T. Nifong regarding same (.5)	8.70
06/30/21	MA Clemente	Correspond with P. Montgomery re: strategy (.4); team strategy call with Kirschner (1.5); team call re: tax issues with Teneo and Kirschner (1.0); prepare for strategy call (.5); call with P. Montgomery re: strategy (.3); analysis various theories and claims (1.4)	5.10
		Task Subtotal	455.60

15 Plan and Disclosure Statement

06/01/21	S Lee	Call with M. Goldman to discuss term sheet	1.50
06/01/21	MP Goldman	Evaluate term sheet and related structure/features of Indemnity Trust (1.3); prepare follow-up revisions to draft term sheet with S. Lee (1.1)	2.40
06/01/21	MA Clemente	Emails with E. Bromagen re: Seery compensation motion (.3); brief review of motion (.2); review prior terms for Seery (.3); review prior motion (.3)	1.10
06/02/21	S Lee	Draft indemnity trust term sheet	4.40
06/02/21	MP Goldman	Review of and revisions to draft indemnity trust term sheet (1.1); formulate funding approach and seniority of claimant	2.10

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Restructuring

Date	Name	Narrative	Hours
06/02/21	MA Clemente	trust obligations (1.0)	
		Read Seery compensation motion (.5); emails with E. Bromagen re: Seery compensation motion (.3); call with J. Seery re: various issues (.5)	1.30
06/02/21	MA Clemente	Analysis of potential MGM sale on plan recoveries (1.4); call with E. Bromagen re: MGM sale and holdings (.3); review materials from J. Seery re: asset holdings and structure (.7)	2.40
06/03/21	S Lee	Draft indemnity trust term sheet	.70
06/03/21	MP Goldman	Draft sections of indemnity trust term sheet and related structuring of funding note (3.80); follow-up with S. Lee regarding further revisions to term sheet and references to underlying claimant trust (.80)	4.60
06/04/21	S Lee	Revise indemnity trust term sheet	.50
06/04/21	S Lee	Call with M. Goldman to discuss term sheet	.50
06/04/21	MP Goldman	Conference with S. Lee regarding final revisions to draft term sheet (.50); analyze comments from Bankruptcy team (.60); review of preliminary comments and final distribution draft of term sheet (.80)	1.90
06/04/21	MA Clemente	Analysis of indemnity trust structure (.7); review draft termsheet (.5); emails with E. Bromagen re: draft termsheet (.2); review E. Bromagen changes (.1); read Dugaboy objection to financing motion (.5); review further revisions to indemnity termsheet (.3); further email from E. Bromagen re: termsheet (.1); review various provisions of claimant trust agreement (.8)	3.20
06/04/21	EA Bromagen	Review and comment on proposed indemnity trust term sheet (.8); emails with M. Clemente re same (.1); discuss same with S. Lee (.1); further revisions to same (.3)	1.30
06/09/21	MP Goldman	Analyze liability-related developments and effect on terms of proposed indemnity trust	.60
06/14/21	MA Clemente	Address issues regarding indemnity trust agreement (.7); emails with E. Bromagen re: indemnity trust agreement (.3); analysis of potential plan upsides (.8)	1.80
06/14/21	EA Bromagen	Emails with Pachulski, Sidley teams re indemnity trust status	.10
06/15/21	MA Clemente	Assess Dugaboy objection to financing (.7); review Dugaboy discovery requests (.4)	1.10
06/16/21	MP Goldman	Review of e-mails and comments to indemnity trust term sheet	.60
06/16/21	MA Clemente	Analysis of LW comments to indemnity trust agreement (.5); analysis of financing termsheet (.8); emails regarding financing termsheet (.3); assess questions regarding financing termsheet (.8); address timing issues for effective date (.5)	2.90

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Restructuring

Date	Name	Narrative	Hours
06/16/21	EA Bromagen	Emails with A. Attarwala, Pachulski, and Sidley teams re scheduling of call re Indemnity Trust term sheet (.2); review of Latham comments to term sheet (.3)	.50
06/17/21	MA Clemente	Analysis of funding termsheet	1.50
06/17/21	EA Bromagen	Emails re scheduling of conference call re indemnity trust	.20
06/18/21	MA Clemente	Call with J. Seery re: timing, financing and related issues	.50
06/21/21	MP Goldman	Review of underlying plan documents and claimant trust structure (.60); conference call with counsel for trustee regarding structure of indemnity trust (1.10); conference with S. Lee regarding revisions to Indemnity Trust Term Sheet (.60)	2.30
06/21/21	MA Clemente	Review updated list of issues from the Debtor on the indemnity trust (.4); participate on team call re: indemnity trust (1.1); emails with E. Bromagen re: indemnity trust (.3); assess open issues on indemnity trust (.4); update email from E. Bromagen re: discussion on trust and financing (.3); analysis of exit timing (.3); address issues for exit oversight board (.5)	3.30
06/21/21	EA Bromagen	Call with Sidley, Pachulski, FTI, and Board members re indemnity trust term sheet (1.1); discuss same with M. Clemente (.1); review of Pachulski comments to term sheet (.5); emails with M. Clemente re status of indemnity trust and financing (.2); discuss same with G. Demo (.2); discuss Indemnity Trust term sheet with A. Attarwala (.1); consideration of same (.2); emails with S. Lee re revisions to term sheet (.3)	2.70
06/21/21	S Lee	Call with M. Goldman to discuss indemnity trust term sheet (.6); revise indemnity trust term sheet (2.1); working group call discussing indemnity trust term sheet (1.1);	3.80
06/22/21	S Lee	Revise indemnity trust term sheet	.50
06/22/21	MP Goldman	Analyze indemnity trust structure (.90); draft revisions to draft term sheet (1.90); review of litigation trust and claimant trust agreement (.80); follow-up with S. Lee regarding final revisions to discussion draft of term sheet (.60)	4.20
06/22/21	MA Clemente	Call with E. Bromagen re: indemnity termsheet (.4); review further revised indemnity termsheet (.7); address next steps for indemnity trust process (.3); analysis of oversight board provisions regarding membership and appointment (.9); read detailed roadmap from E. Bromagen re: oversight board membership (.4)	2.70
06/22/21	EA Bromagen	Review of financing term sheet (.5); emails with G. Demo re questions to financing term sheet (.3); review of revisions to indemnity trust document (.5); further revisions to same (.4); emails with S. Lee re same (.2); emails with Pachulski,	2.10

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Restructuring

Date	Name	Narrative	Hours
06/23/21	MP Goldman	Latham, FTI, Sidley re revised term sheet (.2) Conference call with claimant trustee and counsel regarding indemnity trust term sheet (1.20); review comments to questions regarding indemnity trust (.80); final revisions to indemnity trust term sheet and related trust matters (.80)	2.80
06/23/21	MA Clemente	Call with the Debtor re: indemnity trust termsheet (1.2); review revised versions of trust termsheet (.8); emails with E. Bromagen re: trust termsheet (.4); address comments from UBS re: indemnity trust termsheet (.4)	2.80
06/23/21	EA Bromagen	Discuss indemnity trust with A. Attarwala (.4); discuss same with M. Clemente (.2); call with Pachulski, Board, FTI, Sidley re indemnity trust (1.2); discuss revisions to same with S. Lee and M. Goldman (.3); multiple discussions with A. Attarwala re indemnity trust (.2); discuss same with S. Lee (.1); further discussions re same with G. Demo (.3); review of revisions to trust term sheet (.3); revise term sheet further (.5); emails with Pachulski, Sidley, Board, FTI re same (.2)	3.70
06/23/21	S Lee	Working group call discussing indemnity trust term sheet (1.2); revise indemnity trust term sheet (1.5)	2.70
06/24/21	MP Goldman	Review of additional comments and suggested revisions to indemnity trust term sheet and related open issues	.80
06/24/21	MA Clemente	Analysis of Trussway portion of financing (.9); call with E. Bromagen re: financing and indemnity trust (.4); review current version of indemnity trust termsheet (.9); address emails from creditors re: indemnity termsheet (.5); call with E. Bromagen re: indemnity termsheet (.3); call with J. Pomerantz re: financing (.3); call with J. Seery re: financing and indemnity trust agreement (.4)	3.70
06/24/21	EA Bromagen	Emails with M. Stern and M. Linn re indemnity trust term sheet (.3); discuss indemnity trust term sheet with A. Attarwalla (.3); discuss same with G. Demo (.1); emails with G. Demo and A. Attarwalla re revisions to term sheet (.3); consider issues re same (.4); discuss same with M. Clemente (.1); draft summary of D&O search for debtors motion for indemnity trust and emails with M. Flaharty re same (.5); email to Committee re draft motion for indemnity trust (.2)	2.20
06/25/21	S Lee	Review indemnity trust term sheet comments	.50
06/25/21	MP Goldman	Review of proposed revisions to indemnity term sheet from claimant trustee and members of Creditor Committee (1.10); prepare final draft revisions and proposed operations of indemnity trust (.90)	2.00
06/25/21	MA Clemente	Address emails from creditors re: indemnity trust (.4); review draft of motion for indemnity trust (.5); emails with E.	1.80

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Date	Name	Narrative	Hours
06/25/21	EA Bromagen	Bromagen re: indemnity trust (.3); call with E. Bromagen re; indemnity trust termsheet (.2); review further revisions to termsheet (.4)	
06/25/21	EA Bromagen	Discuss indemnity term sheet with A. Attarwala (.2); discuss same with M. Clemente (.1); discuss same with G. Demo (.1); finalize indemnity trust term sheet and emails to Pachulski re same (.7)	1.10
06/28/21	MA Clemente	Work on effective date issues (1.0); update on timing for effective date (.2)	1.20
06/29/21	MA Clemente	Call with J. Seery re: effective date issues (.4); address indemnity trust document issues (.9); work on issues regarding oversight board member replacement (1.0)	2.30
06/29/21	EA Bromagen	Review and revise plan for transition of oversight board seats (.7); email to M. Clemente re same (.1); emails with M. Kirschner re fee applications (.2)	2.00
06/30/21	M Sternberg	Conference with J. Hong re: indemnity trust	.50
06/30/21	J Hong	Conference with M. Sternberg regarding indemnity trust	.50
06/30/21	J Hong	Conference with M. Goldman regarding indemnity trust (.9); review materials for same (.1)	1.00
06/30/21	MP Goldman	Conference call with J.P. Hong regarding terms of indemnity trust and related open documentation and structure issues	.90
06/30/21	MA Clemente	Call with J. Seery re: effective date (.4); work through claimant trust provisions regarding replacing oversight board (.9); prepare step outline for replacement process (1.0); emails with E. Bromagen re: replacement of oversight board members (.4)	2.70
06/30/21	EA Bromagen	Emails with Committee indemnity trust (.1); emails with M. Clemente re transition of board seats (.2)	.30
		Task Subtotal	94.80
		16 Non-Working Travel	
06/07/21	MA Clemente	Non-working travel time to Dallas for hearings (billed at half the actual time)	2.00
06/09/21	MA Clemente	Non-working return travel time from Dallas to Chicago regarding hearings (billed at half the actual time)	1.70
		Task Subtotal	3.70
		21 Tax	
06/02/21	ST Advani	Review materials from P. Montgomery re transaction tax issues	.40
06/03/21	ST Advani	Review transaction materials for tax issues	.50

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Date	Name	Narrative	Hours
06/17/21	ST Advani	Review materials from P. Montgomery regarding Hunter Mountain (.4); telephone conference with P. Montgomery regarding same (.5)	.90
06/18/21	ST Advani	Review materials on Hunter Mountain transaction (1.8); telephone conference with P. Montgomery, M. Clemente regarding same (.9)	2.70
06/23/21	ST Advani	Analyze Hunter Mountain and CLO Holdco transactions (2.4); telephone conference with P. Montgomery regarding same (.3)	2.70
06/24/21	ST Advani	Analyze CLO Holdco transaction (1.7); call with M. Clark re same (.3); review additional materials received on Hunter Mountain transaction (1.2)	3.20
06/24/21	MA Clark	Call with S. Advani re: Hunter Mountain transaction	.30
06/25/21	ST Advani	Review materials on CLO Holdco transaction	.90
06/30/21	ST Advani	Conference call with Teneo and Sidley team regarding tax issues (1.0); prepare for call (1.4); follow-up on same (.6)	3.00
		Task Subtotal	14.60
24 Creditor Communications			
06/02/21	MA Clemente	Prepare detailed email to committee re: various updates (.5); call with P. Daugherty re: various issues (.3)	.80
06/03/21	MA Clemente	Emails with creditor re: effective date	.30
06/07/21	MA Clemente	Review materials from P. Daugherty	.50
06/24/21	MA Clemente	Emails with claims buyers with respect to indemnity termsheet	.20
		Task Subtotal	1.80
		Total Hours for all Tasks	635.70

JULY – AUGUST 11th, 2021

**Time Records
for
Twenty-First Monthly Fee Application**

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Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
02 Asset Disposition			
07/09/21	A Russell	Review debtors' motions to sell property.	.60
08/02/21	J Hoffman	Review, revise response to sale motions (0.3); finalize and file same (0.1)	.40
Task Subtotal			1.00
05 Committee Meetings			
07/06/21	EA Bromagen	Emails with M. Clemente and UCC re agenda for UCC meeting	.30
07/07/21	R Fink	Participate in and take minutes of weekly UCC call (.5); revise and synthesize minutes re- same (.3)	.80
07/07/21	T Nifong	Participate in weekly UCC/Sidley call regarding various issues	.50
07/07/21	CM Rognes	Attend UCC call regarding various issues	.50
07/07/21	MA Clemente	Participate in committee meeting	.50
07/07/21	EA Bromagen	Preparation for Committee meeting (.6); call with Committee and advisors re various issues (.5); emails with M Clemente re various Committee issues (.2)	1.30
07/28/21	R Fink	Participate in and take minutes on weekly UCC call (.6); revise and synthesize minutes re- same (.2)	.80
07/28/21	MA Clemente	Participate in committee meeting (.6); review materials for same (.1)	.70
07/28/21	PP Reid	Participate in the UCC call regarding various case issues	.60
07/28/21	PH Montgomery	Attend UCC meeting regarding various case issues and updates	.60
07/28/21	T Nifong	Participate in weekly UCC/Sidley call regarding various case issues	.60
07/28/21	EA Bromagen	Prepare for committee call (.3); call with Committee re various issues (.6)	.90
07/28/21	CM Rognes	Attend UCC call regarding various case issues and updates	.60
08/04/21	R Fink	Participate in and take minutes on weekly UCC call	.60
08/04/21	MA Clemente	Participate in committee meeting	.60
08/04/21	CM Rognes	Attend UCC call regarding case issues	.60
08/04/21	EA Bromagen	Call with Committee and Sidley team re various issues	.60

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Date	Name	Narrative	Hours
08/05/21	R Fink	Revise and synthesize meeting minutes from 8/4 committee meeting	.20
08/10/21	MA Clemente	Address UBS resignation	.30
			Task Subtotal
			11.60
06 Business Operations			
07/21/21	MA Clemente	Review crescent lease issues	.40
07/22/21	MA Clemente	Review crescent lease information (.4); emails with Debtor re: crescent lease (.3); analysis of further information from the Debtors re: crescent (.3); review lease agreement (.4)	1.40
07/22/21	J Hoffman	Review crescent lease issues	.20
07/22/21	EA Bromagen	Review crescent lease information and agreement	.40
07/26/21	MA Clemente	Analysis of Maple Park offer	.90
07/27/21	MA Clemente	Assess bid on Maple Park (1.1); emails with E. Bromagen re; bid (.3); email from J. Pomerantz re: bid (.1)	1.50
07/28/21	MA Clemente	Review additional filings on Petrocap (.4); address NexPoint offer (.5)	.90
07/29/21	MA Clemente	Analysis of Petrocap objection and issues (.9); review petrocap documents (.9)	1.80
07/30/21	MA Clemente	Emails with E. Bromagen re: sale objections	.30
			Task Subtotal
			7.80
07 Case Administration			
07/02/21	DJ Lutes	Research case docket for CNOs and related case filings	.20
07/02/21	J Hoffman	Correspondence with Debtor, Sidley team re: depositions	.10
07/06/21	J Hoffman	Update case calendar	.10
07/06/21	MA Clemente	Call with E. Bromagen re: various issues	.30
07/06/21	EA Bromagen	Discuss various issues with G. Demo (.2); call with M. Clemente re various issues (.3)	.50
07/07/21	DM Twomey	Review bankruptcy court report/recommendation regarding withdrawal of reference (.30); brief review of recent emails regarding case issues (.20)	.50
07/07/21	J Hoffman	Advise Sidley team of hearing updates	.10
07/07/21	MA Clemente	Call with E. Bromagen re: various issues (.4); prepare for committee meeting (1.1); team call with FTI re: various issues (.4)	1.90
07/07/21	CM Rognes	Attend UCC pre-call with Sidley and FTI teams	.40

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Date	Name	Narrative	Hours
07/07/21	EA Bromagen	Call with FTI and Sidley re Committee meeting and various issues	.40
07/08/21	MA Clemente	Update emails with A. Russell re: hearing	.20
07/10/21	MA Clemente	Call with J. Pomerantz re: various issues	.40
07/12/21	MA Clemente	Team call with FTI re: various issues (.2); review agenda of open items (.2)	.40
07/12/21	A Russell	Telephone conference with Sidley and FTI teams re current case issues	.20
07/13/21	MA Clemente	Address emails from P. Daugherty (.3); address emails from M. Kirschner (.4)	.70
07/13/21	J Hoffman	Update case calendar	.10
07/14/21	DM Twomey	Review case update, related material from E. Bromagen	.20
07/14/21	MA Clemente	Call with E. Bromagen re: various issues	.30
07/14/21	J Hoffman	Correspondence with E. Bromagen re: P. Daugherty requests	.20
07/14/21	EA Bromagen	Email to Committee re updates on various issues (.4); emails with P. Daugherty and J. Hoffman re transcripts (.1)	.50
07/16/21	DJ Lutes	Emails with S. Caputo regarding case administrative tasks (.2); review materials for same (.4)	.60
07/16/21	J Hoffman	Review joinder re: indemnity trust motion (0.2); finalize, file joinder (0.2)	.40
07/16/21	MA Clemente	Emails with M. Edelman re: oversight board questions	.30
07/19/21	DJ Lutes	Research case docket for updates and deadlines (.2); prepare electronic files for Sidley team regarding same (.3)	.50
07/20/21	MA Clemente	Call with E. Bromagen re: various issues	.40
07/22/21	DJ Lutes	Correspondence with Sidley team regarding case deadlines, status and updates	.30
07/22/21	MA Clemente	Call with J. Seery re: various issues	.30
07/23/21	MA Clemente	Call with M. Kirschner re: various issues	.40
07/26/21	DM Twomey	Review team emails regarding case/adversary filings, fee issue, lease issue	.20
07/27/21	J Hoffman	Prepare hearing and deposition documents to send to UBS	.30
07/27/21	MA Clemente	Call with E. Bromagen re: various case issues	.50
07/27/21	EA Bromagen	Discuss various case issues with M. Clemente	.50
07/28/21	DJ Lutes	Correspondence from team regarding agenda items (.1); review docket materials for filings, updates and deadlines (.1); update	.40

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Date	Name	Narrative	Hours
07/28/21	CM Rognes	electronic files for team (.2)	
07/28/21	J Hoffman	Attend pre-UCC call with Sidley and FTI teams	.30
07/28/21	MA Clemente	Emails with team re: discovery motion procedure status	.10
07/28/21	EA Bromagen	Call with FTI re: various issues (.5); prep for committee meeting (.9)	1.40
07/29/21	J Hoffman	Pre-call with Sidley and FTI teams regarding various issues	.40
07/29/21	MA Clemente	Correspondence with C. Rognes, KCC team re: service requirements (0.1); multiple calls and emails with court re: hearing dates (0.2)	.30
07/29/21	MA Clemente	Call with J. Pomerantz re: various issues	.40
07/30/21	J Hoffman	Calls with Court re: hearing schedules (0.1); review local rules for hearing requirements (0.1)	.20
07/30/21	MA Clemente	Call with E. Bromagen re: various issues	.30
07/30/21	EA Bromagen	Call with M. Clemente re various issues	.30
08/01/21	MA Clemente	Call with J. Pomerantz re: various issues	.40
08/02/21	R Fink	Research re- creditor committee questionnaire and formation notice	.30
08/02/21	DM Twomey	Read/assess Dondero mediation motion (.30); phone conference with M. Clemente regarding same, status update, next steps (.20)	.50
08/02/21	MA Clemente	Update call with FTI (.4); call with E. Bromagen re: various issues (.4); email with Committee re: mediation motion (.1); call with E. Bromagen re: various effective date issues (.6)	1.50
08/02/21	J Hoffman	Draft, file amended NOH	.30
08/02/21	EA Bromagen	Call with FTI and Sidley re various issues (.4); call with M. Clemente re various issues (.4)	.80
08/03/21	MA Clemente	Communications with J. Pomerantz re: various issues (.3); call with E. Bromagen re: various issues (.4)	.70
08/03/21	J Hoffman	Correspondence with clerk re: 2004 motions	.10
08/03/21	EA Bromagen	Emails with Committee re Hunton fee request (.2); emails and calls with M. Clemente re various issues (.4)	.60
08/04/21	CM Rognes	Attend pre-UCC call (in part) with Sidley and FTI regarding various issues	.30
08/04/21	MA Clemente	Call with FTI re: various issues (.4); prepare for committee meeting (.8); correspond with E. Bromagen re: various issues (.4)	1.60

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Date	Name	Narrative	Hours
08/04/21	EA Bromagen	Emails with Committee re agenda for meeting (.2); call with FTI and Sidley re committee call (.4); prepare for Committee call (.3)	.90
08/06/21	MA Clemente	Call with J. Seery re: various issues (.5); call with M. Kirschner re: various issues (.4)	.90
08/09/21	MA Clemente	Call with FTI re: various effective date issues	.50
08/09/21	J Hoffman	Advise T. Nifong of COS requirements	.20
08/10/21	MA Clemente	Emails with E. Bromagen re: sequencing on the effective date (.3); conference with E. Bromagen re: agenda for oversight board (.3)	.60
08/11/21	DJ Lutes	Review effective date notice and related deadlines (.1); prepare updated electronic filing materials from docket for team (.3)	.40
		Task Subtotal	27.10
08 Claims Administration and Objections			
07/08/21	MA Clemente	Analysis of employee stipulation entered by Debtor	.60
		Task Subtotal	.60
09 Corporate Governance and Board Matters			
08/05/21	R Fink	Compile oversight board execution documents	.10
08/11/21	R Fink	Emails with E. Bromagen and claimant trust board members re initial documents and call scheduling (0.20); compile finalized documents re same (0.40); review claimant trust agreement (0.20); draft meeting minutes template re same (0.30)	1.10
		Task Subtotal	1.20
11 Retention			
07/21/21	MA Clemente	Analysis of detailed email from E. Bromagen re: Hunton fees (.5); review prior orders (.5)	1.00
07/21/21	EA Bromagen	Review of review Hunton agreed orders and request from Debtor (.8); draft summary email and correspondence with M. Clemente re Hunton fee request (.8)	1.60
07/22/21	MA Clemente	Address issues re: Hunton retention (.3); email with E. Bromagen re: Hunton retention (.1)	.40
07/22/21	EA Bromagen	Draft summary email to Committee re Hunton fee request	.60
07/26/21	MA Clemente	Address Hunton retention request (.5); emails with E. Bromagen re: Hunton (.3)	.80
07/26/21	EA Bromagen	Emails with M. Clemente re Hunton fees	.40
		Task Subtotal	4.80

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Date	Name	Narrative	Hours
12 Fee Applications			
07/01/21	DJ Lutes	Prepare exhibits and materials for 6th interim fee application (.9); emails to J. Hoffman regarding 19th monthly fee statement and 6th interim (.2); prepare summary task list for 6th interim (.4); research docket for CNOs and docket numbers (.2)	1.70
07/01/21	J Hoffman	Draft, file CNO for Sidley fee application	.40
07/02/21	DJ Lutes	Emails with J. Hoffman regarding monthly and interim fee application (.2); review materials, exhibits and timing for same (.5)	.70
07/02/21	J Hoffman	Review, revise monthly fee application (0.2); correspondence with D. Lutes re: fee application issues (0.1); correspondence with committee re: fee application filings (0.1)	.40
07/06/21	DJ Lutes	Emails with S. Caputo regarding monthly materials (.1); emails with J. Hoffman regarding fee applications (.1); review docket and materials for same (.3); review updates for interim fee application (.2)	.70
07/06/21	J Hoffman	Finalize, file Sidley fee application	.20
07/09/21	MA Clemente	Respond to Kirschner emails re: Teneo fee applications	.30
07/12/21	J Hoffman	Draft portions of interim fee application (1.2); review interim fee application draft (0.1); correspondence with D. Lutes re: revisions to fee app (0.1)	1.40
07/12/21	DJ Lutes	Emails with J. Hoffman regarding 6th interim fee application issues (.1); prepare monthly fee application materials and exhibits for June (4.9); review June costs for compliance (.5); review interim fee application issues (.3)	5.80
07/13/21	DJ Lutes	Emails with J. Hoffman regarding 6th interim fee application issues (.2); revisions to interim fee application (2.7); prepare monthly fee application materials and exhibits for June (.4); prepare June costs for compliance (.4)	3.70
07/13/21	J Hoffman	Revise interim fee application (0.2); correspondence with D. Lutes re: same (0.2)	.40
07/13/21	EA Bromagen	Emails with M. Kirschner re fee application mechanics	.30
07/14/21	DJ Lutes	Emails with J. Hoffman regarding monthly fee statement issues (.2); research materials for same (.3); prepare monthly fee application materials and exhibits (1.4)	1.90
07/14/21	EA Bromagen	Review and emails with G. Polkowitz re Teneo monthly fee application	.50
07/15/21	DJ Lutes	Emails with timekeepers regarding fee application issues (.4); update interim fee application (.2); prepare updated excel	6.20

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Date	Name	Narrative	Hours
07/15/21	EA Bromagen	spreadsheet materials for final fee application (.8); research docket for fee application materials (.2); prepare monthly fee application materials and exhibits (4.6)	
07/16/21	DJ Lutes	Review and comment on Teneo fee application (.8); discuss fee application with M. Kirschner (.1); discuss same with G. Polkowitz (.1)	1.00
07/16/21	J Hoffman	Emails with timekeepers regarding fee application issues (.4); update interim fee application (.5); prepare updated excel spreadsheet materials for final fee application (.3); prepare 20th monthly fee application materials and exhibits for June (4.5); emails with J. Hoffman and M. Clemente regarding interim fee application issues (.3); prepare materials for same (.2); emails with S. Caputo regarding invoices (.2)	6.40
07/16/21	EA Bromagen	Review Teneo fee application (0.3); correspondence with Official Committee re: same (0.1); revise interim fee application (0.2)	.60
07/17/21	DJ Lutes	Discuss Teneo application with G. Polcowicz (.1); further revisions and comments to same (.8); emails with J. Hoffman re same (.1)	1.00
07/19/21	DJ Lutes	Prepare June monthly fee application materials and exhibits	1.50
07/19/21	J Hoffman	Prepare monthly fee application exhibits and charts (2.9); emails with J. Hoffman regarding 6th interim fee application exhibits (.2); review 6th interim fee application materials (.3)	3.40
07/19/21	MA Clemente	Finalize, file interim fee application (0.3); correspondence with Sidley team re: fee application entries (0.1); review, file Teneo fee application (0.4); research rules regarding redactions (0.2)	1.00
07/19/21	EA Bromagen	Review interim fee app	.50
07/20/21	DJ Lutes	Emails with J. Hoffman and G. Polkowitz re Teneo fee application	.20
07/21/21	DJ Lutes	Prepare June monthly fee application exhibits and charts	1.90
07/21/21	DJ Lutes	Emails with S. Caputo regarding monthly fee application materials	.20
07/22/21	DJ Lutes	Emails with S. Caputo regarding fee applications (.3); prepare July monthly materials and exhibits (.8)	1.10
07/22/21	J Hoffman	Review Hunton fee matters	.10
07/23/21	DJ Lutes	Emails to P. Foley regarding fee application	.20
07/26/21	DJ Lutes	Finalize 20th monthly fee application exhibits (.6); assess timing (.1); prepare email to M. Clemente regarding same (.2)	.90
07/26/21	J Hoffman	Confer with FTI team re: interim fee applications	.10
07/27/21	J Hoffman	Draft, file CNO for FTI fee application (0.3); revise FTI	.60

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Date	Name	Narrative	Hours
		interim fee application (0.1); file FTI fee application (0.2)	
07/30/21	DJ Lutes	Correspondence with UST regarding electronic billing data for the 6th interim fee application (.2); prepare materials for same (.3); correspondence with Sidley team regarding June monthly fee statement filing (.2); correspond with J. Hoffman regarding same (.1)	.80
07/30/21	J Hoffman	Review, revise monthly fee app (0.3); correspondence with D. Lutes re: fee application requirements (0.1)	.40
07/30/21	MA Clemente	Review fee application	.60
08/02/21	J Hoffman	Revise fee application (0.3); finalize, file same (0.1)	.40
08/05/21	J Hoffman	Review, revise FTI monthly fee application	.20
08/09/21	J Hoffman	Revise, file FTI monthly fee application	.20
08/11/21	J Hoffman	Review docket and Teneo fee application (0.1); draft CNO for Teneo fee application (0.2)	.30
		Task Subtotal	48.20

14 Litigation

07/01/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
07/01/21	T Nifong	On site document collection and review (8.6); confer with P. Montgomery regarding same (.4)	9.00
07/01/21	CM Rognes	Document review re: investigation (0.1); correspond with T. Nifong re: one-pager (0.1); review, update collection log (0.4)	.60
07/01/21	MA Clemente	Analysis of issues in P. Montgomery email (1.0); analysis of post-petition payment issues (1.1); review materials on captive insurance (.9)	3.00
07/01/21	PH Montgomery	Communications with team and DSI regarding document collection issues (.6); review and revise working chronologies (2.2); review of newly loaded data for QC and analysis (4.2)	7.00
07/02/21	CM Rognes	Review, revise discovery motion (0.6); correspond with M. Clemente, P. Montgomery, and T. Nifong re: investigation (0.9); correspond with P. Montgomery re: document review (0.2); draft discovery issues (0.5); draft discovery exam topics (0.8)	3.00
07/02/21	PH Montgomery	Communications with team regarding Rule 2004 issues (.3); review and revise issue list (.5); call with team regarding insurance issues (.9); summary email regarding vendor issues for debtor (.7); review of documents related to investigation issues (4.1)	6.50
07/02/21	MA Clemente	Internal team call re: captive insurance entity (.9); analysis of	5.30

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Date	Name	Narrative	Hours
		structure and related insurance docs (.9); prepare rule 2004 strategy (1.0); review outline of claims (.9); analysis of claim strategy (1.6)	
07/02/21	T Nifong	Call with P. Montgomery, M. Clemente, and C. Rognes re: Insurance (.9); draft Governance Re one-pager (.8); correspond with L. Gonzales re: documents to be scanned (.1); review Tall Pine documents (.7); correspond with P. Montgomery re: Tall Pine documents (.1); correspond with P. Montgomery re: boxes collected from Debtor (.1); participate in on site document collection and review (1.1)	3.80
07/05/21	CM Rognes	Draft discovery exam topics (1.5); revise discovery motion (0.4); correspond with P. Montgomery re: discovery topics (0.1)	2.00
07/06/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
07/06/21	CM Rognes	Correspond with Teneo, and team re: discovery (0.6); review collection log (0.1); call with P. Montgomery re: investigation (0.2); draft requests for production (1.1); correspond with P. Montgomery regarding 2004 issues (.5); research re: service (0.8); correspond with FTI re: document collection (0.1); correspond with E. Bromagen re: discovery (0.1)	3.50
07/06/21	PH Montgomery	Call with Teneo and team regarding discovery issues (.6); review discovery documents (4.7); draft, review and revise chronologies regarding discovery issues (2.6); call with C. Rognes regarding discovery workstreams (.2); communications with C. Rognes regarding updated 2004 tracker and parties (.5); communications with Teneo regarding scheduling issues (.1)	8.70
07/06/21	MA Clemente	Emails with P. Montgomery re: 2004 (.3); review draft 2004 materials (.8); analysis of potential claims (1.1); emails with C. Rognes re; insurance (.2); analysis of structures (.8)	3.20
07/06/21	T Nifong	Correspond with P. Montgomery and C. Rognes re: document investigation (.2); investigate documents for UCC (1.6)	1.80
07/07/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.20
07/07/21	CM Rognes	Strategize with M. Abdul-Jabbar re: discovery (0.3); draft discovery topics and requests for production (6.4); update discovery tracker (0.2); correspond with Meta-E re: document collection (0.1); correspond with T. Nifong re: discovery (0.2); correspond with P. Montgomery re: discovery tracker (0.1); correspond with FTI re: document collection (0.1)	7.40
07/07/21	PH Montgomery	Review of documents received from Debtor regarding investigation issues	4.10

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Date	Name	Narrative	Hours
07/07/21	T Nifong	Call with C. Rognes re: Rule 2004 RFPs and Topics (.2); draft Rule 2004 RFPs and Topics (.7); correspond with J. Donohue re: onsite collection (.1); correspond with M. Abdul-Jabbar and C. Rognes re: Rule 2004 RFPs and Topics (.1)	1.10
07/08/21	CM Rognes	Draft requests for production and exam topics (4.6); draft cover letter re: document collection (0.1); correspond with T. Nifong re: discovery requests (0.2)	4.90
07/08/21	J Hoffman	Attend hearing on adversary proceeding MWRs (0.7); confer with Sidley team re: discovery issues (0.4)	1.10
07/08/21	PH Montgomery	Prepare for hearing (1.3); attend hearing on motion to withdraw references (.7); review of documents related to investigation (2.7)	4.70
07/08/21	MA Clemente	Emails with P. Montgomery re: various strategy issues (.4); assess various issues from investigation (2.0)	2.40
07/08/21	A Russell	Attend hearing (in part) on motions to withdraw reference.	.70
07/08/21	T Nifong	Draft Rule 2004 Topics and RFPs (4.7); correspond with C. Rognes re: discovery requests (.2)	4.90
07/08/21	EA Bromagen	Attend hearing on Dondero litigation (in part)	.70
07/09/21	CM Rognes	Draft requests for production and exam topics (3.9); correspond with FTI re: document collection (0.1); review notices re: ownership (0.2)	4.20
07/09/21	PH Montgomery	Review of submissions regarding ownership (1.1); review and revise 2004 motion and document requests re same (1.5); review of documents related to investigation issues (2.1)	4.70
07/09/21	MA Clemente	Work on 2004 strategy (1.3); emails with P. Montgomery re: strategy (.4); read Dondero entities disclosures (.5)	2.20
07/09/21	T Nifong	Draft Rule 2004 RFPs and Topics (6.7); correspond with C. Rognes, M. Abdul-Jabbar, and P. Montgomery re: draft Rule 2004 RFPs and Topics (.4)	7.10
07/12/21	J Hoffman	Research rule 2004 requirements	.10
07/12/21	M Abdul-Jabbar	Correspond with litigation team concerning Teneo, case issues and updates	.20
07/12/21	CM Rognes	Draft requests for production and exam topics (4.3); attend weekly professionals call with Sidley and FTI (0.2); document review re: entity organization (0.5); correspond with T. Nifong re: requests for production (0.2); correspond with P. Montgomery re: requests for production (0.2); correspond with litigation support re: document collection (0.1)	5.50
07/12/21	PP Reid	Participate in professional call with Sidley and FTI teams	.20

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Date	Name	Narrative	Hours
07/12/21	PH Montgomery	regarding various issues	
07/12/21	MA Clemente	Review and revise Rule 2004 discovery drafts (.5); call with J. Harap and D. Newman re 2004 (.6); communications with Meta-E regarding document collection and processing (.4); review of documents incoming from Debtor regarding investigation issues (2.1)	6.60
07/12/21	T Nifong	Emails with P. Montgomery re: ACIS (.3); analysis of conduct surrounding ACIS claims (.9); review various statements of ownership filed by Dondero entities (.5)	1.70
07/12/21	R Fink	Draft Rule 2004 RFPs and Topics (5.3); review documents re: transfers in and out of entities (1.3); correspond with C. Rognes and P. Montgomery re: Draft Rule 2004 RFPs and Topics (.6); assess on site document collection (.4)	7.60
07/13/21	CM Rognes	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); emails re- same (.1)	.30
07/13/21	PH Montgomery	Draft requests for production (0.3); draft key players (1.4); review document collection tracker (0.1); correspond with litigation support re: document collection (0.1); correspond with P. Montgomery re: requests for production (0.1); review notices of disclosures (0.2); strategize re: investigation and potential estate claims (3.5)	5.70
07/13/21	MA Clemente	Calls with C. Rognes regarding discovery issues (.2); review of documents and update chronologies regarding same (3.1)	3.30
07/13/21	J Hoffman	Participate in status conference (.3); review various disclosure pleadings filed by Dondero (.8); review Rule 2004 strategy (.9)	2.00
07/13/21	A Russell	Attend hearing on adversary settlement	.20
07/13/21	T Nifong	Attend status conference re settlement of HCM Fund/Advisors adversary.	.20
07/13/21	EA Bromagen	Investigate and analyze documents re: entities and email aliases (3.3); correspond with P. Montgomery and C. Rognes re: Rule 2004 RFPs and Topics (.1); investigate documents and update issues chart (.1)	3.50
07/14/21	CM Rognes	Attend status conference hearing (.2); prepare for same (.1)	.30
07/14/21	PH Montgomery	Draft key players (1.2); document review (0.3); correspond with P. Montgomery re: investigation strategy (0.8); draft requests for production (1.7); correspond with litigation support re: document collection and processing (0.2); strategize with P. Montgomery and Teneo re: investigation (4.5); correspond with T. Nifong re: requests for production (0.2)	8.90
07/14/21		Meetings with Teneo and Sidley teams regarding investigation issues (4.5); review documents and investigation strategies	10.00

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Date	Name	Narrative	Hours
07/14/21	MA Clemente	regarding same (3.0); communications with team regarding data tracking (.4); review of documents related to issues identified by Teneo (2.1)	.90
07/14/21	T Nifong	Correspond with P. Montgomery re: document collection at the Debtor (.4); investigate documents and update issues chart (3.9); draft Rule 2004 RFPs (3.7); confer with M. Wolf re: hard drives collected from Debtor (0.2)	8.20
07/15/21	CM Rognes	Document review (0.5); draft requests for production (3.9); correspond with P. Montgomery re: requests for production (0.2); correspond with vendor re: data collection (0.1); correspond with P. Montgomery re: investigation strategy (0.1); strategize with Teneo and P. Montgomery re: investigation (3.3)	8.10
07/15/21	PH Montgomery	Meetings with Teneo and Sidley team regarding investigation issues (3.3); communications with Meta-E regarding document processing (.5); communications with C. Rognes regarding 2004 RFPs (.2); review and revise RFPs (2.1); research regarding issues identified by Teneo (2.1)	8.20
07/15/21	T Nifong	Draft Rule 2004 RFPs (2.3); confer with C. Rognes re: same (.4)	2.70
07/16/21	CM Rognes	Document review (0.6); draft requests for production (3.6); review, summarize documents re: conflicts (0.7); correspond with P. Montgomery re: requests for production (0.3)	5.20
07/16/21	T Nifong	Draft Rule 2004 RFPs (1.6); correspond with C. Rognes re: same (.2); correspond with P. Montgomery re: compensation from Debtor to employees (.1) investigate and summarize documents re: same (.8)	2.70
07/16/21	MA Clemente	Review draft RFPs (1.0); review draft 2004 (1.3)	2.30
07/16/21	PH Montgomery	Communications with team regarding document collection and processing (.5); review of investigation related materials (1.6); review and revise RFPs (3.2)	5.30
07/18/21	CM Rognes	Draft requests for production (2.3); correspond with T. Nifong re: requests for production (0.1); review arbitration documents (0.1)	2.50
07/18/21	T Nifong	Investigate and analyze documents (1.6); correspond with P. Montgomery and C. Rognes re: same (.1); draft Rule 2004 RFPs (1.3); correspond with C. Rognes re: same (.1)	3.10
07/18/21	MA Clemente	Emails with M. Kirschner re: Meta e request	.30
07/19/21	T Nifong	Draft Rule 2004 RFPs (.3); confer with C. Rognes re: same (.1); confer with C. Rognes and P. Montgomery re: document	.50

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Date	Name	Narrative	Hours
07/19/21	DJ Lutes	review at Debtor (.1) Emails with Sidley team regarding privilege issues (.2); review materials for same (1.4)	1.60
07/19/21	CM Rognes	Draft requests for production (4.7); draft meet and confer plan (1.6); correspond with P. Montgomery re: discovery (0.6); calculate stay deadline (0.5); revise discovery motion (0.4); review arbitration documents (0.1); review deposition notices (0.1); attend indemnity hearing, in part (0.5); correspond with UBS re: upcoming depositions (0.1); correspond with DSI re: document collection (0.1); correspond with P. Montgomery re: document collection (0.1)	8.80
07/19/21	J Hoffman	Attend hearing on indemnity trust motion	1.40
07/19/21	MA Clemente	Address issues re: e-discovery (.3); emails with M. Kirschner re: various issues (.2)	.50
07/19/21	PH Montgomery	Attend hearing re indemnity trust (1.4); review and revise RFPs and Rule 2004 motion, including related research (6.8); team call re RFPs and meet and confer (.6)	8.80
07/20/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings (.2); email with FTI re-same (.1)	.30
07/20/21	T Nifong	Correspond with C. Rognes re: document collection at Debtor (.1); correspond with P. Montgomery and C. Rognes re: Motion to Withdraw the Reference Recommendations to the District Court (.2); analyze Motion to Withdraw the References (.7)	1.00
07/20/21	DJ Lutes	Review materials for privilege issues (1.8); emails with J. Hoffman regarding same (.1)	1.90
07/20/21	CM Rognes	Draft hard copy document collection list (0.4); draft meet and confer plan (2.8); draft requests for production (1.1); document collection (3.2); correspond with J. Hoffman re: dissipation of assets (0.2); correspond with P. Montgomery and litigation support re: document storage (0.3); correspond with litigation support re: document storage (0.1); correspond with T. Nifong re: document collection (0.1)	8.20
07/20/21	J Hoffman	Research re: Fifth Circuit injunction standards	.40
07/20/21	MA Clemente	Analysis of potential claims (1.7); review updated rule 2004 motion (.6)	2.30
07/20/21	PH Montgomery	Review and revise Rule 2004 requests (4.6); assess issues regarding data collection (.6); communications with team regarding deadlines and tasks upcoming in adversary proceeding (.5)	5.70

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Date	Name	Narrative	Hours
07/21/21	T Nifong	Analyze and investigate documents re: cross trades	5.90
07/21/21	DJ Lutes	Correspond with P. Foley regarding privilege issues (.2); prepare materials regarding same (.4)	.60
07/21/21	CM Rognes	Revise motion to stay (0.9); draft requests for production (0.5); meet and confer re: discovery motion (2.7); summarize meet and conferrals (0.2); draft list of entities for discovery (0.2); correspond with vendor re: document storage (0.1); correspond with J. Hoffman re: discovery (0.2); correspond with E. Bromagen re: status of confirmation appeal (0.1); correspond with P. Montgomery re: meet and conferrals (0.4)	5.30
07/21/21	MA Clemente	Review RFP strategy (.6); review drafts of RFPs (1.1); address emails re: RFPs (.4)	2.10
07/21/21	J Hoffman	Call with Sidley litigation team re: discovery motions (0.2); discuss meet and confer issues with C. Rognes (0.2)	.40
07/21/21	PH Montgomery	Communications with Meta e re document processing (.4); review and revise service and conference documents (.5); communications with team re conference requirements (.6); review and revise Rule 2004 discovery and motion (4.2)	5.70
07/22/21	T Nifong	Onsite document collection and review (5.0); participate in Rule 2004 meet and confers (2.3); confer with C. Rognes re: document collection and Rule 2004 meet and confers (.2)	7.50
07/22/21	DJ Lutes	Correspond with P. Foley regarding privilege issues	.20
07/22/21	CM Rognes	Meet and confers re: discovery motion (2.3); draft outstanding issues re: discovery (0.5); revise requests for production (0.3); revise motion to stay (0.2); draft list of entities re: discovery (0.2); correspond with P. Montgomery re: discovery motion (0.7); correspond with P. Montgomery and Debtor's counsel re: discovery motion (0.3); document collection (2.2); correspond with T. Nifong re: document collection (0.2)	6.90
07/22/21	PP Reid	Emails and telephone conference regarding Rule 2004 discovery	.60
07/22/21	MA Clemente	Emails with P. Montgomery re; HCLOF (.3); review meet and confer update (.4); review HCLOF 2004 materials (.8)	1.50
07/22/21	PH Montgomery	Calls with team regarding 2004 motions (1.4); review and revise same (2.7)	4.10
07/23/21	CM Rognes	Draft list of entities re: discovery (0.1); meet and confers re: discovery motion (1.0); correspond with Teneo re: document collection (0.1); correspond with Debtor re: discovery (0.1)	1.30
07/23/21	T Nifong	Participate in Rule 2004 meet and confers	.50
07/23/21	T Nifong	Confer with C. Rognes re: registered agents for 2004 discovery	.10

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Date	Name	Narrative	Hours
07/23/21	MA Clemente	Call with P. Montgomery re: strategy (.5); analysis of Harborvest settlement (.8); address emails with P. Montgomery re: Harborvest (.5)	1.80
07/23/21	D Griffith	Performed company background research for T. Nifong	2.50
07/23/21	PH Montgomery	Call with M. Clemente re 2004 and other discovery issues (.5); communications with team re revisions to 2004 drafts (.6)	1.10
07/23/21	PG Foley	Review of June invoice	3.40
07/24/21	CM Rognes	Correspond with Teneo re: document collection	.10
07/25/21	CM Rognes	Review transcript re: motion to stay adversary proceeding	.10
07/26/21	J Hoffman	Call with C. Rognes to discuss motion requirements (0.1); analyze rules in connection with discovery motions (0.2); discuss strategy for filing discovery motions with Sidley litigation team (0.3)	.60
07/26/21	CM Rognes	Draft task list re: 2004 motion (1.2); strategize with P. Montgomery re: rule 2004 motion (1.3); revise rule 2004 motion (2.3); meet and confer re: rule 2004 motion (1.7); meet and confers re: motion to exceed page limit (0.8); draft motion to exceed page limit (1.6); draft requests for production (1.9); draft declaration in support of rule 2004 motion (0.5); correspond with Debtor re: rule 2004 (0.2); correspond with T. Nifong re: 2004 tasks (0.2); correspond with J. Hoffman re: motion to exceed page limit (0.1); correspond with P. Montgomery re: motion to exceed page limit (0.1); correspond with P. Montgomery re: rule 2004 tasks (0.2)	12.10
07/26/21	B Kirchoff	Search for registered agents or home addresses for service to numerous companies and individuals, for T. Nifong.	3.20
07/26/21	D Griffith	Perform company background research for T. Nifong	3.30
07/26/21	PH Montgomery	Call re 2004 discovery with team (.7); communications regarding motion to expedite, motion to extend page limits and 2004 motions, including meet and confers with team (2.5); review and revise 2004 scheduling related motions and orders (1.7); review and revise exhibits to Rule 2004 motion (6.2)	11.10
07/26/21	MA Clemente	Review Leventon deposition (1.3); emails with P. Montgomery re: various issues (.5); review JP Sevilla depo (.6); assess 2004 issues (1.1)	3.50
07/26/21	T Nifong	Draft Rule 2004 RFPs (2.4); correspond with C. Rognes and P. Montgomery re: draft Rule 2004 RFPs (.5); confer with N. Chisum and L. Gonzales re: documents collected from Debtor (.2); on-site document collection (.6)	3.70
07/27/21	R Fink	Research and revise summary and schedule of pending HCM adversary and appellate proceedings	.30

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Date	Name	Narrative	Hours
07/27/21	PP Reid	Telephone conference(s) with team regarding Rule 2004 discovery and strategies (1.0); emails with team regarding same (.4)	1.40
07/27/21	NP Cade	Correspond with C. Rognes regarding filings (.1); prepare for and efile Motion for Leave to File Brief in excess of 25 pages with Proposed Order (.5); prepare for and efile expedited Motion for Consideration on Motion for Leave to File Brief in Excess of 25 pages with Proposed Order (.4)	1.00
07/27/21	T Nifong	Draft Rule 2004 Motions (3.1); draft Motion for Leave to File Extended Brief (1.1); research litigation issues (.8); draft and revise chronos (1.4); correspond with C. Rognes re: Rule 2004 Motions (.3); participate in Rule 2004 meet and confers (.5); investigate documents re: shared service agreements (2.3)	9.50
07/27/21	CM Rognes	Draft requests for production (2.6); draft task list re: rule 2004 motion (1.1); revise rule 2004 motion (1.6); meet and confers re: rule 2004 motion (1.3); strategize with P. Montgomery re: rule 2004 motion (2.5); strategize with P. Montgomery and Teneo re: rule 2004 (1.8); draft motion to exceed page limit (1.5); draft emergency motion re: motion to exceed page limit (1.5); correspond with P. Montgomery and the Debtor re: rule 2004 (0.4); strategize re: rule 2004 motion (0.5)	14.80
07/27/21	PH Montgomery	Review and revise exhibits to motion for 2004 discovery (1.5); revisions to Rule 2004 motion parties (.8) participate in meet and confer (.5); calls with team regarding 2004 filing and strategies (2.5); calls with C. Rognes re filing preparation and filing of motions re page limits (.4); call with G. Demo and C. Rognes re meet and confer (.5); review and revise filings (7.5)	13.70
07/27/21	MA Clemente	Address various 2004 issues and (1.4); emails with team re: 2004 (.4); review drafts of the 2004 (1.5)	3.30
07/28/21	NP Cade	Communication with C. Rognes regarding filings (.2); submit Proposed Order for Motion for Leave to File Brief in Excess of 25 pages on ECF through single order upload per Clerk (.5); cite check and blue book Rule 2004 Motion (3.3); preparation of exhibits to same (1.4); prepare for and efile Motion and Exhibits (.7)	6.10
07/28/21	T Nifong	Draft Rule 2004 Motions (10.2); investigate registered agents and trustees for service (1.2); correspond with C. Rognes and P. Montgomery re: same (.4); confer with D. Griffith and B. Kirchoff re: same (.6)	12.40
07/28/21	B Kirchoff	Search for registered agents and/or home addresses for service to numerous companies and individuals, for T. Nifong.	1.80
07/28/21	CM Rognes	Draft task list re: rule 2004 motion (0.6); revise requests for production (6.9); revise rule 2004 motion (3.0); revise	14.80

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Date	Name	Narrative	Hours
07/28/21	D Griffith	declaration in support of 2004 (0.7); correspond with Teneo and P. Montgomery re: rule 2004 motion (0.3); meet and confers re: motion to extend stay (0.2); strategize with P. Montgomery re: rule 2004 motion and requests for production (2.1); correspond with P. Montgomery and UBS re: rule 2004 (0.2); correspond with P. Montgomery and the Debtor re: rule 2004 discovery (0.3); correspond with T. Nifong re: requests for production (0.2); correspond with J. Hoffman regarding discovery motion procedure (0.3)	5.00
07/28/21	PP Reid	Performed company backrgound research for T. Nifong	.40
07/28/21	PH Montgomery	Participate in telephone conference with FTI and Sidley teams regarding update	
07/28/21	J Hoffman	Review and revise request for production materials (2.1); communications with C. Rognes and team regarding strategies and next steps for Rule 2004 motions (2.9)	5.00
07/28/21	MA Clemente	Conference with C. Rognes re: discovery motion procedure	.30
07/28/21	PH Montgomery	Email from UST re: 2004 motion (.1); call with P. Montgomery re: 2004 (.3); call with Debevoise re: 2004 (.2); address issues with Kirschner affidavit (.7); emails with E. Bromagen re: Kirschner affidavit (.3); review draft 2004 (.8); review indemnity trust filings to support Kirschner affidavit (.4)	2.80
07/28/21	EA Bromagen	Review and revise Rule 2004 motion and exhibits (3.5); analyze filing materials, service issues and strategies (1.9)	5.40
07/28/21	T Nifong	Review of hearing transcripts (.5); emails with Sidley team re revisions to 2004 filing (.3)	.80
07/29/21	B Kirchoff	Draft Rule 2004 Motion and RFPs (4.3); correspond with C. Rognes re: same (.2); confer with N. Cade re: Filing Rule 2004 Motion and RFPs (.5); call with C. Rognes re: serving Rule 2004 Motion and RFPs (.5); correspond with C. Rognes, N. Cade, T. Stewart, and L. Gonzales re: Service of Rule 2004 Motion (.3); determine proper registered agents to serve Rule 2004 motion (1.4); investigate documents re: trustees for Rule 2004 service (1.1); call with M. Abdul-Jabbar and P. Montgomery re: Motion to Withdraw the Reference (.3)	8.60
07/29/21	CM Rognes	Search for registered agents and/or home addresses for service to numerous companies and individuals, for T. Nifong.	.20
07/29/21		Review requests for production (0.7); revise rule 2004 motion (1.3); revise declaration in support of rule 2004 (0.2); meet and confers re: motion to extend stay (0.4); correspond with P. Montgomery re: rule 2004 next steps (0.5); research re: service (0.2); revise declaration in support of motion to extend stay (0.3); revise motion to extend stay (2.4); correspond with T.	7.40

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Date	Name	Narrative	Hours
07/29/21	D Griffith	Nifong re: service (0.5); correspond with J. Hoffman re: service (0.1); strategize with P. Montgomery re: motion to stay (0.7); correspond with J. Hoffman re: motion to stay setting (0.1)	2.50
07/29/21	M Abdul-Jabbar	Confer with T. Nifong and P. Montgomery regarding draft response to motion to withdraw the reference	.30
07/29/21	PP Reid	Telephone conference with team regarding Rule 2004 discovery issues	.50
07/29/21	PH Montgomery	Review and revise 2004 motion and related communications (1.5); review and revise motion to extend stay (.7) call with team regarding motion to extend stay (.5); conferences with C. Rognes re filings and service issues (.4); review and revise motion to extend stay, affidavit in support and requested relief (2.9); related communications with team regarding same (.8); call with M. Clemente regarding various issues (.4)	7.20
07/29/21	J Hoffman	Discuss strategy for discovery motion with Sidley litigation team	.40
07/29/21	MA Clemente	Call with P. Montgomery re: various issues (.4); address various questions and issues regarding 2004 (2.5)	2.90
07/29/21	NP Cade	Communications with T. Nifong regarding next steps in serving Rule 2004 Motion on parties not on the Court's ECF system (.5); revisions to tracking chart of entities to serve Rule 2004 Motion via U.S. Mail (.4); communication with C. Rognes regarding Motion (.1); cite check and blue book Motion for Further Stay in Adversary Proceeding (1.0); prepare exhibits to same (.6); prepare for and efile Motion, exhibits and Proposed Order (.6)	3.20
07/29/21	EA Bromagen	Emails with P. Montgomery and J. Hoffman re notes adversary litigation status	.20
07/30/21	CM Rognes	Review service documents (0.6); review Rule 2004 motion (0.2); draft task list re: investigation (0.4); correspond with P. Montgomery re: hearing strategy (0.2); correspond with J. Hoffman re: hearing strategy (0.2); correspond with T. Nifong re: service (0.2); correspond with M. Clemente, P. Reid, P. Montgomery, M. Abdul-Jabbar, J. Hoffman, and T. Nifong re: investigation strategy (0.5); correspond with P. Montgomery and Teneo re: investigation strategy and Rule 2004 strategy (0.4); review notices of hearing (0.2); correspond with P. Montgomery re: investigation strategy (0.2); correspond with T. Nifong re: foreign service (0.1)	3.20
07/30/21	M Abdul-Jabbar	Confer with team regarding litigation strategies (1.0); prepare allocation chart in connection with same (1.4); correspond with P. Montgomery regarding same (.2)	2.60

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Date	Name	Narrative	Hours
07/30/21	PH Montgomery	Attend debtor deposition (2.0); team call regarding motion practice (1.0); calls with C. Rognes regarding motion practice issues (.3); review and revise communications for meet and confer (.5); update document summaries (2.8); communications regarding same with team (.8); review of materials for investigation (.8); call with M. Clemente regarding strategy (.5)	8.70
07/30/21	J Hoffman	Conference with Sidley team re: litigation strategy (1.0); multiple calls and emails with Sidley team re: strategy committee motions (0.5); draft notices of hearing (0.3); review litigation documents (0.3)	2.10
07/30/21	MA Clemente	Respond to emails re: protective order (.3); review proposed protective order (.3); team call re: work streams (1.0); strategy regarding hearing timing (.3); call with P. Montgomery re: strategy (.5)	2.40
07/30/21	NP Cade	Communications with T. Nifong regarding service (.5); coordination with First Legal to start process of service of Rule 2004 Motion on foreign entities (.7)	1.20
07/30/21	C Clark	Assemble and electronically file CLO Holdco Adversary Motion to Extend Stay and Notice of Hearing on Rule 2004 Motions	.70
07/30/21	T Nifong	Review and investigate documents re: entities to be served with Rule 2004 Motion (2.0); review service documents and parties re: Rule 2004 Motion (1.4); confer with N. Cade re: documents re: entities to be served with Rule 2004 Motion (.2); correspond with C. Rognes and T. Steward re: documents re: entities to be served with Rule 2004 Motion (.3); correspond with N. Cade and R. Ortiz re: documents re: entities to be served with Rule 2004 Motion (.2); research methods to serve foreign Rule 2004 Motion parties (1.4); participate in Highland team call regarding litigation strategy (1.0); correspond with C. Rognes re: Hague Convention service (.2); draft master issues chart (.3); Correspond with M. Abdul-Jabbar re: master issues chart (.2)	7.20
07/31/21	CM Rognes	Correspond with T. Nifong re: foreign service (0.3); research re: motion to set briefing schedule (0.5); correspond with e-discovery vendor re: document pull (0.5)	1.30
08/01/21	T Nifong	Correspond with M. Abdul-Jabbar and C. Rognes re: allocating issues for investigation	.10
08/01/21	J Hoffman	Review motion to compel mediation	.10
08/01/21	CM Rognes	Draft motion to set briefing schedule (1.0); draft proposed order re: motion to set briefing schedule (0.2); draft emergency motion re: motion to set briefing schedule (0.4); correspond with P. Montgomery re: outstanding tasks (0.2)	1.80

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Date	Name	Narrative	Hours
08/01/21	MA Clemente	Brief review of mediation motion	.30
08/01/21	PH Montgomery	Correspondence with team regarding motion to compel mediation and review of same	.50
08/02/21	PP Reid	Review and revise motion for expedited briefing schedule (.6); emails with team regarding same (.2); participate in weekly professional call with FTI and Sidley teams regarding various issues (.4)	1.20
08/02/21	T Nifong	Correspond with M. Abdul-Jabbar and C. Rognes re: allocating investigation issues (.3); correspond with C. Rognes re: same (.1); confer with R. Ortiz re: serving Cayman Rule 2004 registered agents (.3); draft Opposition to CLO Holdco Motion to Withdraw the Reference (1.4); draft master task list (.6); call with M. Abdul-Jabbar re: Opposition to CLO Holdco Motion to Withdraw the Reference (.3); analyze other adversary proceedings' motion to withdraw the reference briefing (.4); correspond with M. Abdul-Jabbar re: same (.1)	3.50
08/02/21	M Abdul-Jabbar	Review motion to withdraw the reference (.6); confer with T. Nifong regarding same (.3); participate in strategy call relating to Teneo requests (.5); review issue one pager allocations (.2)	1.60
08/02/21	CM Rognes	Meet and confers re: motion to set briefing schedule (0.9); correspond with M. Clemente and P. Reid re: motion to set briefing schedule (0.2); draft motion to set briefing schedule (1.5); attend weekly professionals call with Sidley and FTI (0.4); draft task list re: investigation (0.2); document review (0.5); draft task list re: Rule 2004 (0.2); correspond with M. Abdul-Jabbar re: investigation work plan (0.3); correspond with J. Hoffman re: notice of Rule 2004 hearing (0.1); correspond with Teneo and M. Clemente re: go-forward strategy (0.5); correspond with P. Montgomery re: investigation (0.1)	4.90
08/02/21	C Clark	Assemble and electronically file Emergency Motion to Set Briefing Schedule and Motion for Expedited Consideration on Motion to Set briefing (.9); upload Proposed Orders per same (.4)	1.30
08/02/21	MA Clemente	Read mediation motion (.6); read letter to court re: Nancy Dondero (.2); review motion to set briefing schedule (.4); email with litigation team re: briefing schedule (.1); litigation team strategy call (.5); email with C. Rognes re: objection (.1); revisions to response to sale objections (1.2); emails with E. Bromagen re: revisions (.3); review materials referenced in mediation motion (.4); review debtors draft replies to sale motion (.7); emails regarding briefing schedule for rule 2004 (.3)	4.80

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Date	Name	Narrative	Hours
08/02/21	J Hoffman	Review 2004 motions (0.2); correspondence with C. Rognes re: procedure for same (0.1)	.30
08/02/21	PH Montgomery	Call with C. Rognes re discovery issues (.1); communications with team regarding discovery disputes and related correspondence (.4)	.50
08/02/21	EA Bromagen	Review Dondero motion to compel mediation (.8); draft committee response to objections to sale motions (1.1); revise and file same (.4)	2.30
08/03/21	T Nifong	Correspond with P. Montgomery and C. Rognes re: service of Rule 2004 motions (.2); confer with D. Griffith re: locating registered agents of foreign entities (.3); coordinate service of Rule 2004 entities (.3); correspond with T. Stewart and C. Rognes re: same (.1); investigate documents re: service of Rule 2004 Motion parties (.4); draft service plan (.4)	1.70
08/03/21	CM Rognes	Document review re: investigation (1.2); research re: service (0.5); research re: standing (1.0); draft objection re: protective order (1.9); draft correspondence re: meet and confers (1.0); correspond with Debtor re: Rule 2004 (0.1); correspond with J. Hoffman re: objection to protective order (0.3); correspond with E. Bromagen re: objection to protective order (0.2); strategize re: service (0.3); correspond with Debtor and M. Clemente re: Rule 2004 (0.3)	6.80
08/03/21	MA Clemente	Prepare for sale hearing (2.0); address various emails from Dondero entities re: 2004 briefing schedule (.5); review draft emails in response to Dondero entities (.3); call with Pachulski and C. Rognes re: requests from Dondero entities (.4)	3.20
08/03/21	J Hoffman	Call with C. Rognes to discuss Committee objection (0.3); confer with Sidley litigation team re: procedural issues in APs (0.3); research re: same (0.3)	.90
08/03/21	PH Montgomery	Communications with team regarding meet and confer and related discovery issues	1.00
08/03/21	EA Bromagen	Discuss adversary issues with C. Rognes	.20
08/04/21	T Nifong	Investigate documents re: Highland service plan (.7); draft re: same (.8); correspond with M. Abdul-Jabbar and C. Rognes re: Highland task list (.1); draft Highland task list (.8); draft UCC opposition to CLO Holdco Motion to Withdraw the Reference (.9); correspond with M. Abdul-Jabbar re: same (.1)	3.40
08/04/21	M Abdul-Jabbar	Review motion to withdraw the reference response	.20
08/04/21	CM Rognes	Meet and confers re: Rule 2004 (1.7); document review re: investigation (0.7); revise service plan (0.5); draft objection re: protective order (1.9); research re: substitution of plaintiff (0.9); draft motion for substitution of party (1.0); revise	8.10

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Date	Name	Narrative	Hours
		proposed order re: motion to set briefing schedule (0.3); review contempt opinion (0.2); correspond with Teneo re: document review (0.2); correspond with T. Nifong re: investigation task list (0.1); correspond with M. Clemente re: Rule 2004 (0.1); correspond with E. Bromagen re: substitution of party (0.2); correspond with J. Hoffman re: substitution of party (0.1); revise investigation task list (0.2)	
08/04/21	MA Clemente	Prepare for sale hearing (.6); participate in sale hearing (2.0); call with C. Rognes re: Dugaboy (.1); work on Tall Pines issues (.7); revisions to responses to Draper (.3); address emails from Draper regarding same (.3)	4.00
08/04/21	PH Montgomery	Communications with C. Rognes regarding discovery issues	.30
08/04/21	J Hoffman	Attend hearing on sale motions (1.9); call with C. Rognes re: client substitution procedure (0.1)	2.00
08/04/21	D Griffith	Performed company research for T. Nifong regarding service issues	.50
08/04/21	EA Bromagen	Attend hearing on real estate and interest sales (2.0); discuss adversary proceedings issues with C. Rognes (.2)	2.20
08/05/21	T Nifong	Confer with M. Abdul-Jabbar re: UCC Opposition to CLO Holdco Motion to Withdraw the Reference (.5); investigate documents and draft Rule 2004 Service Plan (1.2)	1.70
08/05/21	M Abdul-Jabbar	Analyze motion to withdraw decisions (.9); review draft response (.3); confer with T. Nifong regarding same (.5)	1.70
08/05/21	CM Rognes	Draft motion to substitute party (0.6); draft objection to protective order (3.5); meet and confers re: Rule 2004 (0.2); draft investigation one-pager (1.4)	5.70
08/05/21	C Clark	Upload revised proposed Order for Sidley team	.50
08/05/21	MA Clemente	Email from Vedder re: mediation (.1); email from Debtor re: mediation (.1); address call from L. Hogewood (.1); email with C. Rogenes re: 2004 (.1); address issues with respect to various 2004 targets (1.5); address emails from Dondero entities regarding documents (.3)	2.20
08/05/21	EA Bromagen	Emails with C. Rognes re response to motion for protective order in adversary cases (.3); review of drafts of same (.5)	.80
08/06/21	M Abdul-Jabbar	Confer with T. Nifong and C. Rognes regarding investigation one-pagers (.5); prepare updates to pending task list (.3)	.80
08/06/21	T Nifong	Confer with C. Rognes re: service plan (.1); call with M. Abdul-Jabbar and C. Rognes re: One-Pagers Investigations Update (.5); confer with M. Abdul-Jabbar re: Status Update (.1)	.70

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Date	Name	Narrative	Hours
08/06/21	CM Rognes	Document review re: investigation (0.9); draft objection to motion for protective order (2.1); research re: intervention (2.2); correspond with T. Nifong re: service plan (0.2); correspond with E. Bromagen re: intervention (0.1); correspond with J. Hoffman re: intervention (0.1); correspond with Debtor re: objection (0.2); strategize with M. Abdul-Jabbar and T. Nifong re: investigation (0.5); correspond with M. Clemente re: protective order objection (0.2); call with M. Clemente regarding same (0.3)	6.80
08/06/21	MA Clemente	Call with C. Rognes re: protective order (.3); address emails with C. Rognes re: protective order objection (.3); strategy re: protective order objection (.4); address emails from various 2004 parties (.5)	1.50
08/06/21	NP Cade	Communication with C. Rognes regarding service of papers on Cayman entities	.20
08/06/21	J Hoffman	Discuss strategy and procedure for upcoming filings with litigation team	.20
08/07/21	CM Rognes	Correspond with J. Hoffman re: intervention (0.3); revise objection to protective order (0.4); correspond with M. Clemente re: protective order objection (0.1); correspond with Teneo re: protective order objection (0.2)	1.00
08/07/21	MA Clemente	Revisions to objection to motion for protective order (.5); email with team re: objection (.2)	.70
08/07/21	J Hoffman	Discuss committee transition procedure with C. Rognes for upcoming pleadings	.10
08/08/21	T Nifong	Investigate documents re: Investigation Issues One-Pagers (2.8); draft Rule 2004 service plan (2.2); correspond with P. Montgomery and C. Rognes re: same (.2)	5.20
08/08/21	CM Rognes	Research re: intervention (1.3); draft investigation one-pager (1.5); correspond with P. Montgomery re: investigation and Rule 2004 task list (0.5); draft meet and confer prep (1.2)	4.50
08/08/21	MA Clemente	Address M. Kirschner email re: mediation	.30
08/08/21	EA Bromagen	Review of Plan and trust documents (.7); summarize potential issue re litigation to M. Kirschner and J. Harap (.7)	1.40
08/09/21	M Abdul-Jabbar	Participate in team strategy call regarding litigation trust update and summary of correspondence with debtor and opposing counsel (.5); finalize revisions to omnibus brief opposing motion to withdraw the reference (1.1); submit same to P. Montgomery (.1)	1.70
08/09/21	T Nifong	Investigate documents and draft re: issues One-Pagers (2.2); draft service plan (1.7); correspond with P. Montgomery, C.	7.20

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Date	Name	Narrative	Hours
08/09/21	CM Rognes	Rognes, J. Hoffman, and T. Stewart re: service of Rule 2004 entities and service Plan (.2); draft Certificate of Service re: Rule 2004 Motion (.7); correspond with M. Abdul-Jabbar re: investigation plan (.2); draft UCC Opposition to Motion to Withdraw the Reference (2.1); correspond with C. Rognes and M. Abdul-Jabbar re: same (.1)	
08/09/21	MA Clemente	Correspond with P. Montgomery and M. Clemente re: intervention (0.5); attend weekly professionals call with Sidley and FTI regarding various case issues (0.5); correspond with the Debtor, M. Clemente, and P. Montgomery re: protective order objection (0.5); revise objection re: protective order (2.2); review Debtor objection to protective order (0.2); draft entity list (0.5); revise certificates of service (0.4); draft one-pager re: investigation (1.7); draft meet and confer prep (0.2); correspond with P. Montgomery re: Rule 2004 meet and confers (0.2); meet and confer with P. Montgomery and Rule 2004 target (0.4); correspond with Debtor re: protective order objection (0.1); document review (0.3); strategize with P. Montgomery re: objection to protective order (0.4); correspond with opposing counsel re: objection (0.1); correspond with P. Montgomery re: service (0.2); strategize re: objection to protective order (0.4)	8.80
08/09/21	C Clark	Call with J. Morris re: protective order objection (.5); call with counsel for the former employees (.4); update email to P. Montgomery re: call with counsel (.2); emails re: mediation (.3); address emails re: objection to protective order (.4); attend to intervention issues in notes proceedings (.5); review Debtor draft of APO objection (.4); review current draft of committee objection to APO (.4)	3.10
08/09/21	PH Montgomery	Assemble and electronically file the Committee's Objection to Motion for Protective Order in both pending adversary proceedings	.80
08/09/21	T Nifong	Calls with team regarding discovery and document issues (1.1); meet and confer regarding Rule 2004 discovery issues and related communications (.5); review and comment on mediation letter (1.0); review and revise objection to protective order request and related communications (1.1); correspondence regarding service issues with C. Rognes (.3)	4.00
08/10/21	CM Rognes	Investigate and draft re: issues one pagers (4.8); correspond with F. Archanjo re: same (.1); call with M. Abdul-Jabbar, F. Archanjo, and C. Rognes (.6); correspond with P. Montgomery and C. Rognes re: service plan and certificate of service (.2); draft service plan for unserved parties (1.3)	7.00
08/10/21		Draft meet and confer prep (0.8); draft task list re: Rule 2004 (0.5); strategize re: mediation (1.0); document review re:	5.20

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Date	Name	Narrative	Hours
		investigation (1.2); revise service plan (0.5); correspond with M. Abdul-Jabbar, T. Nifong, and F. Archanjo re: investigation (0.6); correspond with opposing counsel re: Rule 2004 discovery (0.2); correspond with P. Montgomery re: confidentiality (0.2); correspond with P. Montgomery re: meet and confers (0.2)	
08/10/21	FM Archanjo	Attend team call (in part) regarding investigation	.50
08/10/21	M Abdul-Jabbar	Analyze draft one-pagers and provide feedback to team regarding same (2.2); confer with C. Rognes, T. Nifong, and F. Archanjo regarding investigation (0.6)	2.80
08/10/21	PH Montgomery	Correspond with M. Clemente re discovery (.3); team call re mediation request and strategy (1.0); communications with J. Harap regarding revisions to mediation response letter (.2)	1.50
08/11/21	CM Rognes	Attend Wick Phillips deposition (in part) (3.1); document review (0.2); summarize deposition (0.4); draft outline re: motion to stay argument (0.5)	4.20
08/11/21	PH Montgomery	Communications with J. Morris and C. Rognes regarding meet and conference	.40
		Task Subtotal	647.10

15 Plan and Disclosure Statement

07/01/21	MP Goldman	Follow-up emails with E. Bromagen and J.P. Hong regarding structure and documentation of Indemnity Trust	.50
07/01/21	J Hong	Conference with E. Bromagen regarding indemnity trust	.30
07/01/21	J Hong	Review motion for approval of indemnity trust	1.60
07/01/21	MA Clemente	Call with E. Bromagen re: oversight board issues	.40
07/01/21	EA Bromagen	Discuss indemnity trust concept with J.P. Hong (.3); emails with J.P. Hong re same (.2); discuss oversight board issues with M. Clemente (.4); review oversight board documents and related issues (.7)	1.60
07/02/21	MA Clemente	Call with J. Seery re: emergence issues (.4); continued review of oversight board structure (.7) emails with E. Bromagen re: oversight board (.3)	1.40
07/02/21	EA Bromagen	Review oversight board documents and procedures and revise sequencing of board actions (.9); emails with UCC, creditors, Debtor re same (.4); emails with M. Clemente re same (.3)	1.60
07/06/21	J Hong	Analyze issues regarding Fifth Amended Plan of Reorganization	1.60
07/06/21	J Hong	Analyze Disclosure Statement in connection with Indemnity Trust	.50

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Date	Name	Narrative	Hours
07/06/21	MA Clemente	Address oversight board structure issues (.5); emails with E. Bromagen re: oversight board (.3); analysis of petro cap materials (.9); revisions to process outline (.7)	2.40
07/06/21	EA Bromagen	Discuss oversight board issues with J. Moldovan (.1); emails with M. Clemente re oversight board issues (.3); emails with creditors re oversight board issues (.3); emails with S. Advani re indemnity trust (.3); review of petrocapi sale documents (.7)	1.70
07/07/21	MA Clemente	Address oversight board issues (.9); emails with E. Bromagen re: oversight board issues (.3); review provisions of claimant trust agreement (.4); assess petro cap sale issues (.8); assess real estate sale issues (.5); review draft sale filings (.6)	3.50
07/07/21	EA Bromagen	Emails with M. Clemente re oversight board issues (.4); review of post effective date documents (.7); review of maple avenue sale documents (.8) emails with M. Hankin re Oversight Board Documents (.2) discuss petrocapi and maple ave sale with G. Demo (.3) discussion and emails re petrocapi sale with E. Cheng (.5) email to Committee summarizing sale follow up issues (.5); call with M. Clemente re various effective date issues (.4)	3.80
07/08/21	J Hong	Draft Indemnity Trust Agreement	5.60
07/08/21	DM Twomey	Correspond with M. Clemente regarding update, indemnity agreement, member discussions (.20); brief review of various emails from E. Bromagen, committee members (.20)	.40
07/08/21	MA Clemente	Call with J. Seery re: various issues (.4); work on oversight board issues (.9); review debtor's sale motion for real estate (.4)	1.70
07/08/21	EA Bromagen	Emails with G. Demo and K. Posin re Maple Ave sale agreement (.2); review of same (.2); review of claimant trust agreement and issues with governance (.6); emails with M. Clemente re same (.3); emails with J.P. Hong and G. Demo re indemnity trust issues and timing (.3)	1.60
07/09/21	MP Goldman	Analyze structure of Indemnity Trust (.3); follow-up email with J.P. Hong regarding same (.1)	.40
07/09/21	MA Clemente	Emails with E. Bromagen re: indemnity trust agreement (.4); work on Cornerstone sale issues (.5)	.90
07/09/21	J Hong	Email with M. Goldman regarding Indemnity Trust and Indemnification Funding Note (.1); draft Indemnity Trust Agreement (3.8); correspond with E. Bromagen regarding Indemnification Funding Note (.1)	4.00
07/09/21	EA Bromagen	Emails with M. Clemente re indemnity trust agreement (.5); review of indemnity trust term sheet and related issues (.5); discuss various issues with E. Cheng (.1); discuss indemnity trust and various issues with G. Demo (.3); discuss indemnity	1.90

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Date	Name	Narrative	Hours
07/10/21	J Hong	trust with J.P. Hong (.1); emails re indemnity trust with J.P. Hong (.2); emails with G. Demo re indemnity trust and other issues (.2)	1.60
07/10/21	MA Clemente	Draft Indemnity Trust Agreement	.50
07/10/21	EA Bromagen	Assess cornerstone sale issues	.80
07/11/21	J Hong	Emails with J.P. Hong re indemnity trust (.2); draft oversight board documents (.6)	2.20
07/12/21	MA Clemente	Draft Indemnity Trust Agreement	1.20
07/12/21	MP Goldman	Analysis of issues surrounding indemnity trust note (.9); review detailed email from E. Bromagen re: indemnity trust (.3)	2.20
07/12/21	J Hong	Conference call with J.P. Hong and E. Bromagen regarding terms and structure of Indemnity Trust Agreement and related issues (1.4); conference call with Claimant Trustee counsel regarding Funding Note (.40); review related documentation issues with J.P. Hong and E. Bromagen (.40)	6.60
07/12/21	EA Bromagen	Correspond with Citi regarding potential representation as indemnity trustee (.2); conference with JPM regarding potential representation as indemnity trustee (.3); draft Indemnity Trust Agreement (3.9); teleconference with Pachulski and Sidley regarding Indemnity Trust and Indemnification Funding Note (.4); correspond with M. Goldman regarding Indemnity Trust and Indemnification Funding Note (.4); teleconference with M. Goldman and E. Bromagen regarding Indemnification Funding Note and Indemnity Trust (1.4)	4.20
07/13/21	MP Goldman	Call with J.P. Hong and M. Goldman re indemnity trust issues and review/preparation for same (1.4); analyze issues re indemnity trust note security (.5); emails with M. Clemente re same (.4); call with Sidley and Pachulski re indemnity trust issues (.4); review of documents re same (.4); draft indemnity trust note (.6); draft oversight board documents (.5)	2.20
07/13/21	J Hong	Review of proposed terms of exit financing security and coordination with Indemnity Trust and formulate approach (.80); conference call with Wilmer Hale and Pachulski regarding structure, terms of Indemnity Trust; and related drafting issues (1.40)	6.50
07/13/21	EA Bromagen	Draft Indemnity Trust Agreement (4.5); teleconference with Wilmer Hale and Pachulski regarding Indemnity Trust (1.4); correspond with M. Goldman regarding Indemnity Trust (.6)	4.00

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Date	Name	Narrative	Hours
07/14/21	MA Clemente	indemnity trust note and review of indemnity trust agreement draft (1.1); review of indemnity trust and claimant trust mechanics (.6); email to M. Clemente re same (.2)	
07/14/21	MP Goldman	Review updated timing regarding assets (.4); call with J. Seery and creditors re: plan update (1.5); review objection to indemnity trust (.5); analysis of revised information from the Debtor (.7); work on oversight board issues (1.0)	4.10
07/14/21	J Hong	Conference call with Weil and Wilmer regarding terms of Indemnity Trust and Funding Note (.60); review of and revisions to draft Indemnity Trust Agreement (3.0); follow-up with J.P. Hong regarding specific provisions and further revisions (.20)	3.80
07/14/21	EA Bromagen	Conference with M. Goldman regarding indemnity funding note and exit financing (.2); teleconference with Weil Gotshal, Wilmer Hale and Pachulski regarding Indemnity Trust and interplay with exit financing (.6); revise draft Indemnity Trust Agreement per M. Goldman's comments (2.2)	3.00
07/15/21	MA Clemente	Call with Seery, DSI, UBS, Latham re update to plan forecasts (1.5); analyze effective date issues (.2); discuss various effective date issues with M. Clemente (.3)	2.00
07/15/21	MP Goldman	Read claimant trust provisions (.7); work on response strategy to indemnity trust objection (1.5); emails with E. Bromagen re: outline of response (.3); assess objection (.5); call with D. Pauker regarding case issues (.4); review claimant trust provisions (.6)	4.00
07/15/21	J Hong	Conference call with J.P. Hong regarding terms and structure of Indemnity Trust Agreement and related issues and procedures (.90); conference call with G. Demo/Pachulski regarding court challenge to Indemnity Trust and trustee/custodial issues (.50); follow-up with J.P. Hong regarding same (.30); conference call with JPMorgan regarding potential trust custodial engagement and related terms and requirements (1.10)	2.80
07/15/21	EA Bromagen	Correspond with M. Goldman regarding Indemnity Trustee selection (.4); revise draft Indemnity Trust Agreement per discussion with M. Goldman (1.1); teleconference with Pachulski and M. Goldman regarding Indemnity Trustee selection (.5); follow up with M. Goldman regarding same (.3); correspond with Citibank, JPMorgan and BNYM regarding Indemnity Trust (.2); revise draft Indemnity Trust Agreement per M. Goldman's comments (2.8); conference with M. Goldman regarding comments on draft Indemnity Trust Agreement (.9)	6.20
07/15/21		Discussions with G. Demo re various plan effective date issues	1.60

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Date	Name	Narrative	Hours
07/16/21	MP Goldman	(.2); email with S. Advani re revisions to indemnity trust (.2); draft response to indemnity trust objection (1.2)	
07/16/21	DM Twomey	Conference calls with potential corporate trustees regarding terms of Indemnity Trust and related fee structure (2.10); conference with G. Demo/Pachulski regarding trustee issues and related terms (.50); correspond with J.P. Hong regarding same (.10)	2.70
07/16/21	MA Clemente	Emails with UCC, team regarding indemnity trust issues/response to objection	.20
07/16/21	J Hong	Revisions to response to objection to indemnity trust agreement motion (1.3); read provisions of claimant trust agreement (.4); analysis of plan provisions (.4); address counter arguments to objection to indemnity trust (.5); review motion to approve indemnity trust (.5); further revisions to response (.4); emails with E. Bromagen re: response (.4); prepare for hearing (1.0)	4.90
07/16/21	EA Bromagen	Conference with M. Goldman regarding Indemnity Trustee selection (.1); call with Citi regarding trustee fees (.3); correspond with Pachulski regarding Indemnity Trustee selection (.1); review correspondence between Pachulski and Sidley regarding indemnity trustee (.1); teleconference with Citibank regarding Indemnity Trust (1.2); correspond with Citibank regarding Indemnity Trust (.2)	2.00
07/19/21	DM Twomey	Discuss various post effective date issues with M. Clemente (.4); revise indemnity trust objection response (.8); further revisions to same (.3); emails to Committee and Pachulski re same (.2)	1.70
07/19/21	MP Goldman	Emails regarding indemnity trust motion, related filings (.20); correspond with M. Clemente regarding hearing update (.10)	.30
07/19/21	MA Clemente	Follow-up regarding potential institutional trustees/custodians regarding Indemnity Trust	.40
07/19/21	EA Bromagen	Prepare for hearing on indemnity trust (2.0); participate in hearing on indemnity trust (1.4); address team emails regarding upcoming depositions (.3); review draft indemnity trust agreement (.9)	4.60
07/20/21	MP Goldman	Attend hearing on indemnity trust (1.4); review materials for same (.1)	1.50
07/20/21	MA Clemente	Review of comments/proposed revisions to draft Indemnity Trust Agreement and related Trustee/custodian issues	.70
07/20/21	EA Bromagen	Review revisions to trust agreement (.8); address emails re: revisions to trust agreement (.2); analysis of structure of note (.7); sequencing of steps for oversight board (.7)	2.40

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Date	Name	Narrative	Hours
07/20/21	J Hong	Correspond with Citi regarding Indemnity Trust (.1); correspond with BNYM regarding Indemnity Trust (.1); analyze Sidley bankruptcy team comments on indemnity claims submission process (.2); respond to Sidley bankruptcy team comments on the draft Indemnity Trust Agreement (.1); correspond with JPM regarding Indemnity Trust (.1); respond to BNYM KYC questions regarding Indemnity Trust (.4)	1.00
07/20/21	EA Bromagen	Call with M. Clemente re various effective date issues (.4); emails with J.P. Hong and prospective corporate trustees re indemnity trust (.3); review and comment on indemnity trust agreement (1.6); emails with J.P. Hong, M. Goldman, Pachulski, oversight board members re same (.3); develop oversight board sequencing (.5); review of claimant trust agreement re same (.3)	3.40
07/21/21	EA Bromagen	Email to Committee re Indemnity Trust	.20
07/22/21	MA Clemente	Emails from claim buyers re: oversight board (.2); review draft indemnity trust agreement (1.5); analysis of note issues (.5)	2.20
07/23/21	MA Clemente	Call with J. Seery re: various issues (.4); call with Latham re: oversight board (.4); call with E. Bromagen re: oversight board (.4); analysis of claimant trust agreement (.9); address issues regarding oversight board (1.1)	3.20
07/23/21	EA Bromagen	Assess issues re Oversight Board and analysis of claimant trust agreement re same (.5) call with M. Clemente re same (.4)	.90
07/26/21	MA Clemente	Address indemnity trust issues (.9); work on step plan (.5); emails with Bromagen re: oversight board (.3); address effective date timing (.3); work on step plan for oversight board (.9)	2.90
07/26/21	EA Bromagen	Emails with M. Clemente re oversight board (.3); discuss oversight board issues with J. Moldovan (.2); discuss oversight board and other effective date issues with A. Attarwala (.2); draft oversight board documents (1.2); review of indemnity trust draft (.6); review of Maple Ave sale offer (.2)	2.70
07/27/21	MA Clemente	Work on Oversight Board issues (1.0); emails with E. Bromagen re: oversight board (.3)	1.30
07/27/21	MP Goldman	Review of proposed structural variation to Indemnity Trust and comments from potential trustee	.60
07/27/21	J Hong	Analyze correspondence between Sidley and Pachulski regarding the Indemnity Trust and Trustee selection (.1); assess comments from Wilmington Trust on the Indemnity Trust Agreement (.1)	.20
07/27/21	EA Bromagen	Review of Maple Ave sale document and emails with Committee re same (.3); email with M. Clemente re agenda for	2.20

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Date	Name	Narrative	Hours
07/28/21	MA Clemente	Committee Meeting (.2); discuss various issues with G. Demo (.2); revisions to oversight board governance documents (1.3); emails with M. Clemente re same (.2)	
07/28/21	MA Clemente	Revisions to trust oversight board documents (1.0); email with E. Bromagen re: changes (.2); emails with E. Bromagen re: changes to oversight board (.3); review timing and sequence of oversight board changes (.4); review debtor changes to indemnity trust agreement (.4); review UBS changes to indemnity trust agreement (.5); emails with E. Bromagen re: indemnity trust (.3)	3.10
07/28/21	MP Goldman	Review of UBS and legal counsel comments to draft Indemnity Trust Agreement and related terms (.90); conference call with WT and counsel regarding structure of Trust (.50); evaluate application of DE strategy trust act and related tax and credit issues (.60)	2.00
07/28/21	J Hong	Assess comments on the Claimant Trust Agreement (.2); perform analysis of comments on the Indemnity Trust Agreement (.4); teleconference with Wilmington Trust, Berger Harris, Morris James and Pachulski regarding the Indemnity Trust Agreement (.5); correspond regarding tax implications of change of Indemnity Trust from common law trust to Delaware statutory trust with S. Advani (.1); perform analysis of comments on the Indemnity Trust Agreement (.9)	2.10
07/28/21	EA Bromagen	Revisions to oversight board documents (1.4); review of further revisions to indemnity trust agreement (.5); emails with Sidley team re same (.1); emails with G. Demo re Hunton fee issue (.3)	2.30
07/29/21	MA Clemente	Work on resolving oversight board issues (1.1); call with E. Bromagen re: oversight board issues (.4); email with potential independent member (.1); review step plan (.4)	2.00
07/29/21	MP Goldman	Assess open issues and counsel comments to draft Indemnity Trust Agreement (.60); review of DE statutory trust conversion issues regarding structure of Indemnity Trust (.40)	1.00
07/29/21	EA Bromagen	Revise oversight board documents (.9); draft sequencing of member replacement (.3); discuss various plan implementation issues with M. Clemente (.4); analyze strategies and materials for same (.4); consider board replacement issues and revisions to documents re same (.5); review post effective date documents (.4); emails with M. Clemente re same (.2)	3.10
07/30/21	MA Clemente	Work on resolving issues regarding oversight board (1.2); call with potential independent member (.6); call with E. Bromagen re: oversight board (.4); review claimant trust agreement provisions (.5); email with E. Bromagen re: indemnity trust (.1); review various issues on indemnity trust agreement (.9)	3.70

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Date	Name	Narrative	Hours
07/30/21	MP Goldman	Review of additional comments from counsel and DE revisions to Indemnity Trust draft	.50
07/30/21	J Hong	Discuss changes to Indemnity Trust relating to Delaware statutory trust with E. Bromagen (.1); analyze revised Indemnity Trust Agreement (.4);	.50
07/30/21	EA Bromagen	Further revisions to oversight board documents (1.5); revise plan for sequencing oversight board actions (.5); review of claimant trust agreement re same (.3); correspondence with M. Clemente, UCC, oversight board members re same (.6); call with M Clemente re oversight board issues (.4)	3.30
08/01/21	MA Clemente	Anlaysis of questions by independent oversight board candidate (.4); email with E. Bromagen re: indemnity trust (.1)	.50
08/02/21	R Fink	Draft engagement letter re- Richard Katz as disinterested member (.6); analyze Claimant Trust Agreement (.4); review oversight committee launch documents (.2); call with E. Bromagen re- same (.2); emails to E. Bromagen re- same (.1)	1.50
08/02/21	MA Clemente	Emails with potential independent board member (.2); address indemnity trust issues (1.0); address questions from potential independent board member (.4)	1.60
08/02/21	EA Bromagen	Call with C. Provost re Oversight Board (.4); review various agreements re effective date issues (1.1); review revisions to indemnity trust (.5); call with M. Clemente re various effective date issues (.6)	2.60
08/03/21	MA Clemente	Address timing issues for Effective Date (.4); call with E. Bromagen re: effective date issues (.3); address indemnity trust issues (1.2); address issues raised by independent oversight board member (1.0); call with E. Bromagen re: indemnity trust (.4); review further comments to indemnity trust agreement (.6); review revised draft oversight board resolutions (.4); review and revised retention letter with independent director (.5)	4.80
08/03/21	MP Goldman	Analyze Advisory Committee comments regarding termination and Claimant Trust and residual indemnity (.5); follow-up with E. Bromagen regarding same (.2); review and analysis of further comments to Indemnity Trust provisions (.5); follow-up tasks regarding DE statutory trust provisions (.3)	1.50
08/03/21	J Hong	Correspond with E. Bromagen regarding additional comments on draft indemnity trust agreement (.1); assess additional comments on draft indemnity trust agreement (.1); review correspondence between E. Bromagen and M. Goldman regarding indemnity trust structure (.2); analyze additional comments on draft indemnity trust agreement (.3)	.70

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Date	Name	Narrative	Hours
08/03/21	EA Bromagen	Revisions to oversight board documents (.5); emails with M. Clemente and R. Fink re same (.3); call with A. Attarwala re revisions to indemnity trust agreement (.1); review of same (.2); emails with G Demo re same (.1); calls with G. Demo re effective date issues (.2); multiple calls with M. Clemente re effective date planning, trust documents and related issues (.7); analyze trust and effective date issues for same (.7); review and revision of trust documents and oversight board documents and consideration of same (2.3); correspond with M. Clemente re agenda for committee meeting (.3); discuss adversary issues with C. Rognes (.2); discuss oversight board issues with A. Attarwalla (.1).	6.70
08/04/21	MP Goldman	Conference call with Debtor counsel and Committee representatives regarding termination of Claimant Trust and effect on funding and administration of Indemnity Trust (.6); formulate drafting approach and funding process with J.P. Hong along with documentation issues (.5)	1.10
08/04/21	MA Clemente	Call with E. Bromagen re: indemnity trust issues (.2); review indemnity trust update (.3); analysis of indemnity issues (.8); address structure of oversight board (.7); review claimaint trust agreement re: indemnity (.5); analyze oversight board structure (.4)	2.90
08/04/21	J Hong	Teleconference with Pachulski, Latham and Sidley regarding indemnity trust construct post-termination of claimant trust (.5); conference with M. Goldman regarding indemnity trust construct post-termination of claimant trust (.5)	1.00
08/04/21	EA Bromagen	Discuss various effective date issues with A. Attarwala (.2); discuss same with M. Clemente (.2); revisions to oversight board documents (.5); emails with R. Katz re same (.3); call with G. Demo and A. Attarwalla and M. Goldman and J.P. Hong re indemnity trust issues (.6)	1.80
08/05/21	MP Goldman	Analyze revised sections of draft Indemnity Trust and related administrative approach	.60
08/05/21	J Hong	Revise draft indemnity trust agreement per comments from Delaware counsel and Latham Watkins	1.20
08/05/21	MA Clemente	Work on oversight board issues (2.4); calls with E. Bromagen regarding same (.6); revisions to detailed email to oversight board re: various issues (.5); emails with E. Bromagen re: oversight board issues (.5); address emails from future oversight board member (.4); address emails from Redeemer re: resignations (.2)	4.60
08/05/21	EA Bromagen	Review of plan and related documents re effective date issues (1.6); calls with M. Clemente regarding same (.6); emails with	2.70

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Date	Name	Narrative	Hours
08/06/21	MP Goldman	M. Clemente re oversight board issues (.5) Analyze revised Indemnity Trust Agreement and related DE statutory trust provisions	.50
08/06/21	MA Clemente	Further revisions to communication to future oversight board members (.4); email with E. Bromagen re: board communications (.1); call with J. Harap re: provisions of claimant trust and plan (.3); call with E. Bromagen re: claimant trust provisions (.6); analysis of claimant trust and plan provisions (.5); review detailed email from J. Harap re: claimant trust provisions (.3); review draft resolutions (.4); emails with E. Bromagen re: resolutions (.1); review sequence of resignations (.3); email from J. Terry re: resignation (.1)	3.10
08/06/21	J Hong	Correspond with E. Bromagen regarding draft indemnity trust agreement (.2); correspond with E. Bromagen regarding conflicting comments from parties on draft indemnity trust agreement (.1); revise draft indemnity trust agreement per further comments from Pachulski (.2); revise draft indemnity trust agreement per discussion with Pachulski and Sidley (1.5); correspond with Pachulski regarding indemnity trust (.1)	2.10
08/06/21	EA Bromagen	Review of revisions to claimant trust (.5); emails with G. Demo, M. Clemente re effective date issues (.3); discuss claimant trust issues with M. Clemente (.6); review and revise oversight board materials (.8); discuss effective date process with G. Demo, DSI (.5); emails regarding various issues with M. Clemente (.5); review of Plan and effective date issues (.8); discuss same with J. Harad (.3); revisions to oversight board resolutions (.6)	4.90
08/07/21	MA Clemente	Detailed email from E. Bromagen re: various issues (.3); review further analysis of claimant trust provisions (.4); email with E. Bromagen re: claimant trust (.1); address changes to various resolutions (.3); assess ratification request from Pachulski (.4); review claimant trust agreement (.4); review sequence for effective date (.3); further review of detailed email to oversight board regarding resolutions for financing and indemnity trust and process (.4)	2.60
08/07/21	EA Bromagen	Revisions to oversight board materials and draft email to oversight board members re same (1.1); revise indemnity trust agreement and emails with A. Attarwala and G. Demo re same (1.2); emails with R. Katz re revisions to indemnity trust (.2)	2.50
08/08/21	MA Clemente	Address further emails re: claimant trust mechanics (.4); email with E. Bromagen re: claimant trust (.1); review claimant trust mechanics (.3)	.80
08/08/21	J Hong	Teleconference with Sidley corporate regarding Dual's diligence-based exclusions and outstanding items (.3); revise	.80

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Date	Name	Narrative	Hours
08/09/21	R Fink	Dual policy mark-up per teleconference (.5)	
08/09/21	DM Twomey	Emails with E. Bromagen re- claimant trust oversight board signatures (.2); draft and revise checklist re- same (.7); compile documents re- same (.2)	1.10
08/09/21	MA Clemente	Correspond with M. Clemente regarding UCC update, plan effectiveness	.20
08/09/21	MP Goldman	Conference with E. Bromagen re: claimant trust agreement (.4); analysis of oversight board issues (1.1); address timing issues for effective date (.4); various emails with E. Bromagen re: resolutions (.4); address finalization of indemnity trust (.4); emails with E. Bromagen re: UBS board seat (.3); analysis of claimant trust agreement re: various issues (1.3); analysis of transfer of causes of action to the trust (.9)	5.20
08/09/21	J Hong	Review of DE counsel and other party comments to revised Indemnity Trust draft and related issues (1.10); conference call with PSZ and LW regarding open issues and successor trust indemnity (.60); conference with J.P. Hong regarding final revision to Indemnity Trust Agreement and related issues (.50)	2.20
08/09/21	EA Bromagen	Assess Pachulski's comments on the Indemnity Trust Agreement (.3); revise Indemnity Trust Agreement per Pachulski's comments (.2); conference with M. Goldman regarding purchase of insurance post-Indemnity Trust Agreement (.5); revise indemnity trust agreement per teleconference with Pachulski and Latham (.3); review correspondence between Pachulski and Sidley regarding revised Indemnity Trust Agreement (.1); teleconference with Pachulski and Latham regarding Claimant Trust Agreement and Indemnity Trust Agreement (.6)	2.00
08/09/21	MA Clemente	Discuss claimant trust agreement with M. Clemente (.4); various emails with M. Clemente re oversight board resolutions (.4); revisions and finalization of same (1.9); emails with oversight board members re same (.4); review revisions to indemnity trust (.4); emails with M. Clemente regarding UBS board seat issues (.3); address same issue (.4); discuss same with A. Attarwala (.2); review of claimant trust agreement and effective date / board oversight issues (1.6); emails with K. Posin and G. Demo re claimant trust agreement (.3); discuss same with G. Demo (.1)	6.40
08/10/21	MA Clemente	Review language for claimant trust agreement (.2); confer with E. Bromagen re: claimant trust agreement (.2); review Wilmington changes to claimant trust agreement (.4); review trust provisions in plan (.2); address changes to reflect intent and remedy inconsistencies in trust agreement (.8); emails with E. Bromagen re: changes proposed by Debtor (.3); address timing of effective date (.2); analysis of sequencing of effective	5.60

Invoice Number: 41052991
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
08/10/21	MP Goldman	date actions (.4); address indemnity issues under claimant trust agreement (.4); review current version of indemnity trust agreement (.7); review GP indemnity consent (.2); review plan provisions re: GP indemnity consent (.2); analysis of language re: transfer of causes of action (.5); attend to various claimant trust issues (.9)	
08/10/21	R Fink	Review and analysis of DE/DTNC and other counsel comments/revisions to Indemnity Trust Agreement (1.20); analyze Claimant Trust revisions and integration with Indemnity Trust and related follow-up with PSZ (.70); conference call with J.P. Hong regarding further revisions to Trust Agreement and coordination with other primary trust documents and DST certificate (.80)	2.70
08/10/21	J Hong	Compile signature pages re claimant trust oversight board (.2); emails with E. Bromagen re claimant trust oversight board launch documents (.1)	.30
08/10/21	EA Bromagen	Assess comments from Wilmington on the Litigation Sub-Trust Agreement (.2); analyze comments from Wilmington on the Indemnity Trust Agreement and Claimant Trust Agreement (.4); call with M. Goldman regarding Trust Agreements and related documents (.8); review and comment on revised Indemnity Trust Agreement based on comments from Wilmington Trust (.3); review correspondence between Pachulski and Latham regarding comments from Wilmington on the Indemnity Trust Agreement (.4)	2.10
08/10/21	R Fink	Review proposed language for claimant trust agreement (.2); discuss same with M. Clemente (.2); review Delaware trustee revisions to claimant trust agreement (.5); consider potential changes to remedy inconsistencies in claimant trust agreement (.9); emails with M. Clemente re: changes proposed by Debtor (.3); review indemnity trust agreement (1.2)	3.30
08/11/21	MA Clemente	Participate in and take notes on claimant trust oversight board meeting (.9); draft formal board minutes re same (.4)	1.30
08/11/21	MP Goldman	Finalize effective date issues (1.0); discussions with E. Bromagen re: various oversight board issues (.4); emails with E. Bromagen re: oversight board issues (.3); address resignations (.4); emails with team re: resignations (.3); work on oversight board issues (1.5); prep for and participate in oversight board call (1.1); conference with E. Bromagen re: oversight board call (.3)	5.30
08/11/21	EA Bromagen	Review of final documentation issues for Indemnity Trust and related integration/implementation regarding Claimant Trust effectiveness (.60); review of final revisions to Indemnity Trust (.30); and follow-up correspondence with G. Demo/PSZ and	1.10

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Restructuring

Date	Name	Narrative	Hours
08/11/21	J Hong	J.P. Hong (.20) Analyze correspondence between Pachulski, Morris James and Wilmington Trust regarding Claimant Trust Agreement	.20
08/11/21	J Hong	Teleconference with Pachulski, Latham, Morris James and Wilmington Trust regarding Claimant Trust Agreement	.10
08/11/21	EA Bromagen	Finalize and release multiple board resolutions, emails with J. Seery, G. Demo, Attarwalla, and Oversight Board Members re same (.2.3); emails with M. Clemente re agenda for oversight board meeting (.3), discussions re same (.4); review of KYC information for litigation sub trust (.5); emails with M. Kirschner re same (.3); multiple emails and discussions with G. Demo re effective date issues (.4); emails and calls with A. Attarwalla re same (.3); attend first oversight board meeting re effective date and various issues (1.1); preparation for same with M. Clemente (.3)	5.90

Task Subtotal 260.80

21 Tax

07/06/21	ST Advani	Review e-mail on new trust structure	.10
07/08/21	ST Advani	Review indemnity trust agreement term sheet and issues	.40
07/09/21	MA Clark	Analyze materials from S. Advani re: charitable entities and related issues in bankruptcy proceeding	2.00
07/12/21	ST Advani	Review proposed indemnification trust issues (.8); telephone conference with M. Clark regarding Dondero issues (.5)	1.30
07/12/21	MA Clark	Telephone call with S. Advani re: charitable entities involved in bankruptcy case	.50
07/13/21	ST Advani	Email to E. Bromagen regarding Indemnity Trust Agreement	.60
07/23/21	ST Advani	Review indemnity trust agreement	.60
07/28/21	ST Advani	Email to JP Hong re trust formation issues	.20

Task Subtotal 5.70

24 Creditor Communications

07/06/21	MA Clemente	Address emails with Acis	.40
07/13/21	EA Bromagen	Emails with P. Daugherty re transcripts	.20
07/19/21	MA Clemente	Address Meta E request	.40
07/19/21	EA Bromagen	Call claims buyer re questions on plan	.10
07/20/21	MA Clemente	Email from creditor re: claimant trust	.10
07/22/21	DM Twomey	Emails with UCC/advisors regarding lease amendment, fee	.20

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Restructuring

Date	Name	Narrative	Hours
07/22/21	MA Clemente	issue	
		Emails with the Committee re: crescent lease (.4); email with P. McVoy re: lease (.2); emails with UBS re: crescent lease (.4)	1.00
07/29/21	MA Clemente	Address questions from creditor re: oversight board	.30
07/30/21	MA Clemente	Review various materials from P. Daugherty	.70
08/02/21	MA Clemente	Call with A. Clubok re: various issues	.50
08/03/21	MA Clemente	Call with A. Clubok re: various issues	.50
08/09/21	MA Clemente	Review resignation letter from UBS	.20
08/10/21	MA Clemente	Call with claim buyer re: claimant trust agreement	.30
08/10/21	MA Clemente	Emails with P. McVoy re: UBS resignation	.20
		Task Subtotal	<u>5.10</u>
		Total Hours for all Tasks	1,021.00

Exhibit D

Expense Detail

JUNE 2021

Expense Detail

from

Twentieth Monthly Fee Application

Invoice Number: 41041971
 Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
06/02/21	05/30/2021 - ON TIME COURIERS INC - 322216 - messenger delivery service to P. Reid residence for Sidley Dallas office regarding litigation preparation, deposition and hearing materials on 5/25/21	\$47.03
06/02/21	May 28, 2021 - Juliana Hoffman - Transcript Fees - Transcript	229.20
06/03/21	06/02/21-Duplicating Charges (Color) Time: 10:33:00	4.06
06/05/21	05/16/21-Westlaw research service	110.01
06/05/21	05/18/21-Westlaw research service	165.02
06/05/21	05/18/21-Westlaw research service	110.01
06/05/21	05/19/21-Westlaw research service	55.01
06/05/21	05/16/21-Westlaw research service	55.01
06/05/21	05/17/21-Westlaw research service	165.02
06/05/21	05/23/21-Westlaw research service	55.01
06/05/21	05/24/21-Westlaw research service	220.02
06/05/21	05/25/21-Westlaw research service	55.01
06/05/21	05/26/21-Westlaw research service	110.01
06/10/21	Filing Fees 4/21/21 - SUPREME COURT CLERK	16.00
06/10/21	05/05/21-Westlaw research service	55.01
06/10/21	05/09/21-Westlaw research service	55.01
06/10/21	05/10/21-Westlaw research service	20.79
06/10/21	05/10/21-Westlaw research service	110.01
06/10/21	05/15/21-Westlaw research service	110.01
06/10/21	05/14/21-Westlaw research service	220.02
06/10/21	05/05/21-Westlaw research service	220.02
06/10/21	05/09/21-Westlaw research service	55.01
06/10/21	05/10/21-Westlaw research service	55.01
06/10/21	05/12/21-Westlaw research service	46.69
06/10/21	05/12/21-Westlaw research service	55.01
06/10/21	05/13/21-Westlaw research service	55.01
06/10/21	05/02/21-Westlaw research service	55.01

Invoice Number: 41041971
 Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
06/10/21	05/03/21-Westlaw research service	793.75
06/10/21	05/03/21-Westlaw research service	110.01
06/10/21	05/05/21-Westlaw research service	46.69
06/10/21	05/05/21-Westlaw research service	275.03
06/10/21	05/07/21-Westlaw research service	55.01
06/10/21	05/15/21-Westlaw research service	82.83
06/10/21	05/15/21-Westlaw research service	110.01
06/15/21	Electronic Data Hosting	285.00
06/16/21	06/15/21-Duplicating Charges (Color) Time: 9:17:00	1.74
06/16/21	E-Discovery Monthly Service Fee	2,308.00
06/18/21	06/17/21-Duplicating Charges (Color) Time: 11:52:00	0.29
06/23/21	06/22/21 - Epiq Connect - 210621.00752 Reprographics	34.37
06/23/21	Professional Services Consulting (Project Mgr)	3,997.50
06/24/21	06/23/21-Duplicating Charges (Color) Time: 12:00:00	0.29
06/24/21	06/20/2021 - ON TIME COURIERS INC - 322679 - messenger delivery service to P. Reid residence for Sidley Dallas office regarding litigation preparation and hearing materials on 6/17/21	47.03
06/25/21	06/16/2021 - TSG REPORTING INC - 2051033 - CERTIFIED TRANSCRIPT OF WITNESS MARK PATRICK	1,197.30
06/26/21	06/07/21-Westlaw research service	220.02
06/27/21	06/25/21 - Epiq Connect - 250621.00941 Reprographics	54.13
06/29/21	06/28/21-Duplicating Charges (Color) Time: 14:38:00	0.87
06/29/21	06/27/2021 - ON TIME COURIERS INC - 322838 - messenger delivery service to Sidley Dallas office from C. Rognes residence on 6/23/21 regarding hearing materials for next day hearing	82.78
		Total \$12,211.68

JULY – AUGUST 11th, 2021

**Expense Detail
for**

Twenty-First Monthly Fee Application

Invoice Number: 41052991
 Official Committee of Unsecured

Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
05/06/21	02/23/2021 - TSG REPORTING INC - 2040255 - CERTIFIED TRANSCRIPT OF SCOTT ELLINGTON	\$1,201.70
07/07/21	Professional Services Consulting (Project Mgr) in connection with litigation discovery materials	325.00
07/07/21	06/11/2021 - TSG REPORTING INC - 2050514 - CERTIFIED TRANSCRIPT OF JAMES DONDERO	846.90
07/07/21	06/11/2021 - TSG REPORTING INC - 2050526 - CERTIFIED TRANSCRIPT OF GRANT SCOTT	972.45
07/08/21	06/02/2021 - TSG REPORTING INC - 2049506 - JAMES DONDERO	1,529.80
07/09/21	05/26/2021 - TSG REPORTING INC - 2048691 - TRANSCRIPT	743.30
07/09/21	05/26/2021 - TSG REPORTING INC - 2048684 - TRANSCRIPT	929.40
07/13/21	E-Discovery Monthly Service Fee	2,308.00
07/14/21	07/13/21-Duplicating Charges (Color) Time: 10:48:00	8.12
07/14/21	07/13/21-Duplicating Charges (Color) Time: 11:16:00	0.29
07/14/21	07/13/21-Duplicating Charges (Color) Time: 14:59:00	0.29
07/14/21	06/17/21-PACER TXNBK	0.60
07/14/21	06/25/21-PACER TXNBK	4.90
07/14/21	06/25/21-PACER TXNBK	3.00
07/14/21	06/26/21-PACER TXNBK	3.00
07/14/21	06/27/21-PACER TXNBK	3.00
07/14/21	06/28/21-PACER TXNBK	3.00
07/14/21	06/29/21-PACER TXNBK	3.00
07/14/21	06/30/21-PACER TXNBK	3.00
07/14/21	06/18/21-PACER TXNBK	6.00
07/14/21	06/19/21-PACER TXNBK	3.00
07/14/21	06/20/21-PACER TXNBK	3.00
07/14/21	06/21/21-PACER TXNBK	3.00
07/14/21	06/22/21-PACER TXNBK	3.00
07/14/21	06/23/21-PACER TXNBK	6.00
07/14/21	06/24/21-PACER TXNBK	3.00

Invoice Number: 41052991
Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
07/14/21	04/01/21-PACER TXNBK	2.50
07/14/21	04/02/21-PACER TXNBK	2.50
07/14/21	04/03/21-PACER TXNBK	2.50
07/14/21	04/04/21-PACER TXNBK	2.50
07/14/21	04/05/21-PACER TXNBK	2.50
07/14/21	04/06/21-PACER TXNBK	2.50
07/14/21	04/07/21-PACER TXNBK	2.50
07/14/21	04/08/21-PACER TXNBK	2.50
07/14/21	04/09/21-PACER TXNBK	2.50
07/14/21	04/10/21-PACER TXNBK	2.50
07/14/21	04/11/21-PACER TXNBK	2.50
07/14/21	04/12/21-PACER TXNBK	2.50
07/14/21	04/13/21-PACER TXNBK	2.50
07/14/21	04/14/21-PACER TXNBK	2.50
07/14/21	04/15/21-PACER TXNBK	2.50
07/14/21	04/16/21-PACER TXNBK	2.50
07/14/21	04/17/21-PACER TXNBK	2.50
07/14/21	04/18/21-PACER TXNBK	2.50
07/14/21	04/19/21-PACER TXNBK	2.50
07/14/21	04/20/21-PACER TXNBK	2.50
07/14/21	04/21/21-PACER TXNBK	2.50
07/14/21	04/22/21-PACER TXNBK	2.50
07/14/21	04/23/21-PACER TXNBK	2.50
07/14/21	04/24/21-PACER TXNBK	2.60
07/14/21	04/25/21-PACER TXNBK	2.60
07/14/21	04/26/21-PACER TXNBK	2.60
07/14/21	04/27/21-PACER TXNBK	2.60
07/14/21	04/28/21-PACER TXNBK	2.60
07/14/21	04/29/21-PACER TXNBK	2.60
07/14/21	04/30/21-PACER TXNBK	2.60
07/14/21	05/01/21-PACER TXNBK	2.70

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Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
07/14/21	05/02/21-PACER TXNBK	2.70
07/14/21	05/03/21-PACER TXNBK	2.70
07/14/21	05/04/21-PACER TXNBK	2.70
07/14/21	05/05/21-PACER TXNBK	2.70
07/14/21	05/06/21-PACER TXNBK	2.70
07/14/21	05/07/21-PACER TXNBK	2.70
07/14/21	05/08/21-PACER TXNBK	2.80
07/14/21	05/09/21-PACER TXNBK	2.80
07/14/21	05/10/21-PACER TXNBK	2.80
07/14/21	05/11/21-PACER TXNBK	2.90
07/14/21	05/12/21-PACER TXNBK	2.90
07/14/21	05/13/21-PACER TXNBK	2.90
07/14/21	05/14/21-PACER TXNBK	2.90
07/14/21	05/15/21-PACER TXNBK	2.90
07/14/21	05/16/21-PACER TXNBK	2.90
07/14/21	05/17/21-PACER TXNBK	3.00
07/14/21	05/18/21-PACER TXNBK	3.00
07/14/21	05/19/21-PACER TXNBK	3.00
07/14/21	05/20/21-PACER TXNBK	3.00
07/14/21	05/21/21-PACER TXNBK	3.00
07/14/21	05/22/21-PACER TXNBK	3.00
07/14/21	05/23/21-PACER TXNBK	3.00
07/14/21	05/24/21-PACER TXNBK	3.00
07/14/21	05/25/21-PACER TXNBK	3.00
07/14/21	05/26/21-PACER TXNBK	3.00
07/14/21	05/27/21-PACER TXNBK	3.00
07/14/21	05/28/21-PACER TXNBK	3.00
07/14/21	05/29/21-PACER TXNBK	3.00
07/14/21	05/30/21-PACER TXNBK	3.00
07/14/21	05/31/21-PACER TXNBK	3.00
07/14/21	06/01/21-PACER TXNBK	3.00

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Restructuring

Date	Narrative	Amount
07/14/21	06/02/21-PACER TXNBK	3.00
07/14/21	06/03/21-PACER TXNBK	3.00
07/14/21	06/04/21-PACER TXNBK	3.00
07/14/21	06/05/21-PACER TXNBK	3.00
07/14/21	06/06/21-PACER TXNBK	3.00
07/14/21	06/07/21-PACER TXNBK	3.00
07/14/21	06/08/21-PACER TXNBK	3.00
07/14/21	06/09/21-PACER TXNBK	3.00
07/14/21	06/10/21-PACER TXNBK	3.00
07/14/21	06/11/21-PACER TXNBK	3.00
07/14/21	06/12/21-PACER TXNBK	3.00
07/14/21	06/13/21-PACER TXNBK	3.00
07/14/21	06/14/21-PACER TXNBK	3.00
07/14/21	06/15/21-PACER TXNBK	3.00
07/14/21	06/16/21-PACER TXNBK	3.00
07/14/21	06/17/21-PACER TXNBK	3.00
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 08, 2021 - Matthew A. Clemente - Change ticket fee for airfare in connection with travel to Dallas for hearings and meetings	41.00
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 04, 2021 - Matthew A. Clemente - Airfare - three legged economy airfare (with complimentary upgrade) between Chicago, Dallas and NYC in connection with travel to Dallas for hearings and meetings (airfare was split and reduced amongst another firm client matter) - United Airlines	1,422.59
07/15/21	07/14/21-Duplicating Charges (Color) Time: 11:21:00	0.29
07/15/21	07/14/21-Duplicating Charges (Color) Time: 11:27:00	2.61
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 11, 2021 - Matthew A. Clemente - Parking at Chicago airport in connection with travel to Dallas for hearings and meetings (parking fare was split and reduced with another firm client matter)	144.00
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 07, 2021 - Matthew A. Clemente - Taxi/Car Service from Dallas airport to hotel on 6/7/21 in connection with travel to Dallas for hearings	70.87

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Date	Narrative	Amount
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 09, 2021 - Matthew A. Clemente - Taxi/Car Service from Dallas hotel to the airport on 6/9/21 in connection with travel to Dallas for hearings	37.01
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 08, 2021 - Matthew A. Clemente - Dinner for one attendee in Dallas on 6/8/21 in connection with travel to Dallas for hearings (Dinner charge voluntarily reduced to \$70 from original amount)	70.00
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 08, 2021 - Matthew A. Clemente - Lunch for 3 attendees in Dallas on 6/8/21 in connection with travel to Dallas for hearings (attendees include M. Clemente, P. Daugherty and P. Montgomery)	52.39
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 09, 2021 - Matthew A. Clemente - Lodging for two nights in Dallas on 6/7/21 and 6/8/21 includes a per night \$239 room rate, \$17.06 City Occupancy tax, \$14.63 State Occupancy tax and \$4.78 Tourism fee all in connection with travel to Dallas for hearings	550.94
07/15/21	06/07/21-06/11/21 Chicago to New York City - Jun 07, 2021 - Matthew A. Clemente - Internet service fee to work while flying on 6/7/21 in connection with travel to Dallas for hearings	15.99
07/16/21	Electronic Data Hosting	864.75
07/16/21	06/14/21-Telephone Charges Conference Call	0.34
07/17/21	06/25/21- Federal Express Corporation- TR #280814098813 JOE FLOWERS INFORMATION NOT SUPPLIED	29.15
07/17/21	04/14/21-PACER TXNDC	2.80
07/17/21	05/03/21-PACER TXNBK	0.20
07/17/21	04/08/21-PACER TXNBK	0.70
07/21/21	Jul 15, 2021 - Shelly K. McKinley - Lunch - Lunch for four (4) attendees in Sidley Dallas office in connection with Highland client meeting (attendees include A. Scott, J.Kass, P. Montgomery and C. Rognes)	76.31
07/23/21	04/05/21-PACER 00PCL	0.10
07/23/21	04/05/21-PACER TXNBK	4.50
07/23/21	05/09/21-PACER 00PCL	0.20
07/23/21	05/09/21-PACER TXNBK	26.40
07/23/21	05/11/21-PACER 00PCL	0.10
07/23/21	05/11/21-PACER TXNBK	3.00
07/23/21	04/05/21-PACER TXNBK	18.10
07/23/21	05/18/21-PACER TXNBK	2.90
07/23/21	05/20/21-PACER 00PCL	0.10

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Date	Narrative	Amount
07/23/21	05/20/21-PACER 05CA	6.30
07/23/21	04/14/21-PACER TXNDC	14.60
07/23/21	04/15/21-PACER TXNDC	16.60
07/23/21	04/16/21-PACER 00PCL	0.20
07/23/21	04/16/21-PACER 05CA	9.60
07/23/21	04/16/21-PACER TXNDC	4.00
07/23/21	04/07/21-PACER TXNBK	1.70
07/23/21	04/07/21-PACER TXNDC	1.40
07/23/21	04/08/21-PACER TXNDC	3.80
07/23/21	04/19/21-PACER TXNDC	0.60
07/23/21	04/20/21-PACER 00PCL	0.50
07/23/21	04/20/21-PACER 05CA	0.10
07/23/21	04/20/21-PACER TXNBK	8.80
07/23/21	04/20/21-PACER TXNDC	1.80
07/23/21	04/12/21-PACER 00PCL	0.90
07/23/21	04/12/21-PACER 05CA	15.00
07/23/21	04/12/21-PACER TXNBK	2.40
07/23/21	04/13/21-PACER 00PCL	0.10
07/23/21	04/13/21-PACER 05CA	0.20
07/23/21	04/14/21-PACER 00PCL	0.50
07/23/21	04/14/21-PACER 05CA	0.50
07/23/21	04/14/21-PACER TXNDC	5.00
07/23/21	05/20/21-PACER 00PCL	1.10
07/23/21	05/20/21-PACER 05CA	0.30
07/23/21	05/20/21-PACER TXNBK	0.10
07/23/21	05/20/21-PACER TXNDC	2.60
07/23/21	05/14/21-PACER 00PCL	0.10
07/23/21	05/14/21-PACER TXNBK	6.90
07/23/21	04/21/21-PACER 00PCL	0.10
07/23/21	04/21/21-PACER TXNDC	0.20
07/23/21	05/03/21-PACER TXNBK	4.70

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Date	Narrative	Amount
07/23/21	06/28/21-PACER TXNDC	1.20
07/23/21	04/05/21-PACER 00PCL	0.10
07/23/21	04/05/21-PACER DEBK	7.20
07/23/21	04/05/21-PACER TXNBK	17.90
07/23/21	04/04/21-PACER TXNBK	1.70
07/23/21	04/06/21-PACER TXNBK	1.70
07/23/21	04/07/21-PACER TXNBK	1.50
07/23/21	04/07/21-PACER TXNDC	0.20
07/23/21	04/20/21-PACER TXNBK	22.90
07/23/21	05/07/21-PACER TNWBK	0.20
07/23/21	05/07/21-PACER TXWBK	4.50
07/23/21	05/20/21-PACER TXNBK	3.00
07/23/21	05/19/21-PACER TXNBK	0.50
07/23/21	05/26/21-PACER TXNDC	3.70
07/23/21	04/30/21-PACER TXNDC	6.00
07/23/21	05/03/21-PACER TXNBK	0.20
07/23/21	05/03/21-PACER TXNDC	0.60
07/23/21	05/04/21-PACER TXNBK	0.10
07/23/21	05/05/21-PACER TXNBK	0.20
07/23/21	05/07/21-PACER TXNDC	4.20
07/23/21	04/05/21-PACER TXNBK	0.10
07/23/21	04/21/21-PACER TXNDC	1.30
07/23/21	04/11/21-PACER TXNBK	0.10
07/23/21	04/17/21-PACER TXNBK	0.60
07/23/21	04/19/21-PACER TXNBK	0.10
07/23/21	04/22/21-PACER 05CA	0.40
07/23/21	04/26/21-PACER 00PCL	0.10
07/23/21	04/26/21-PACER 03CA	0.20
07/23/21	04/26/21-PACER 05CA	0.10
07/23/21	04/26/21-PACER TXNDC	1.70
07/23/21	04/29/21-PACER TXNBK	0.30

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Date	Narrative	Amount
07/23/21	05/27/21-PACER TXNDC	0.50
07/23/21	04/29/21-PACER TXNBK	0.70
07/23/21	05/11/21-PACER TXNBK	0.50
07/27/21	Encrypted Hard Drive (2 TB) for litigation discovery materials	600.00
07/27/21	Professional Services Consulting (Project Mgr) for litigation discovery materials	1,592.50
07/27/21	04/22/21-PACER TXNBK	38.50
07/27/21	05/27/21-PACER TXNBK	3.00
07/27/21	06/30/21-PACER TXNBK	6.80
07/29/21	07/28/21-Duplicating Charges (Color) Time: 11:28:00	0.87
07/31/21	07/23/21- Federal Express Corporation- TR #943479970805 ALYSSA SCOTTI INFORMATION NOT SUPPLIED	38.31
07/31/21	07/06/21- Federal Express Corporation- TR #501867973480 SIDLEY AUSTIN LLP CHANDLER M ROGNES 2021 MCKINNEY AVENUE DALLAS, TX 75201	14.24
08/04/21	08/03/21-Duplicating Charges (Color) Time: 10:28:00	4.64
08/05/21	08/03/21 - Epiq Connect - 030821.00102 Reprographics	4,287.41
08/05/21	Professional Services Consulting (Project Mgr)	227.50
08/06/21	08/04/21 - Epiq Connect - 040821.00124 Reprographics	267.92
08/06/21	E-Discovery Monthly Service Fee	2,308.00
08/06/21	07/28/21-Westlaw research service	83.15
08/06/21	07/29/21-Westlaw research service	55.01
08/10/21	08/09/21-Duplication charges Time: 12:04:00	9.00
08/10/21	08/09/21-Duplication charges Time: 11:47:00	35.10
08/10/21	08/09/21-Duplication charges Time: 12:03:00	10.80
08/10/21	08/09/21-Duplication charges Time: 12:02:00	4.50
08/10/21	08/09/21-Duplication charges Time: 12:02:00	2.70
08/10/21	08/09/21-Duplicating Charges (Color) Time: 11:24:00	4.64
08/11/21	08/10/21-Duplicating Charges (Color) Time: 9:08:00	3.19
08/12/21	08/11/21-Duplicating Charges (Color) Time: 7:51:00	0.58
08/12/21	07/13/21- Federal Express Corporation- TR #281420754608 JOE FLOWERS META-E DISCOVERY	29.34
08/12/21	07/14/21- Federal Express Corporation- TR #281445524382 LYNN H TUBALINAL SIDLEY AUSTIN LLP 1 S DEARBORN ST CHICAGO, IL 60603	26.45

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Date	Narrative	Amount
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	36.59
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - FOR NO 57	0.37
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	36.59
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO. 59	0.37
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	36.59
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO. 61	0.37
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	182.95
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO 63	1.83
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	36.59
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO 65	0.37
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	36.59
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO 67	0.37
08/12/21	Filing Fees 7/26/21 - GENERAL REGISTRY - CAYMAN ISLAND DOCUMENTS	36.59
08/12/21	Filing Fees 7/27/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO 60	0.37
08/12/21	Filing Fees 7/29/21 - GENERAL REGISTRY - CAYMAN ISLAND COMPANY SEARCH	36.59
08/12/21	Filing Fees 8/2/21 - INTERNATIONAL TRANSACTION FEE - TRANSACTION FEE FOR NO 73	0.37
08/16/21	08/01/2021 - TRANSUNION RISK AND ALTERNATIVE DATA SOLUTIONS INC - 1120000721 - Search charges	120.00
08/20/21	07/28/21-Telephone Charges Conference Call	0.71
08/21/21	06/30/2021 - SECRETARY OF STATE OF TEXAS - 502000621 - Documents ordered	14.00
08/25/21	08/04/21-Westlaw research service	55.01

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Date	Narrative	Amount
08/25/21	08/06/21-Westlaw research service	46.69
08/25/21	08/06/21-Westlaw research service	55.01
08/25/21	08/08/21-Westlaw research service	55.01
08/25/21	08/09/21-Westlaw research service	55.01
08/26/21	08/11/2021 - TSG REPORTING INC - 2056495 - CERTIFIED TRANSCRIPT	798.60
08/31/21	07/31/2021 - SECRETARY OF STATE OF TEXAS - 375000721 - Documents ordered	77.00
09/03/21	6/21/2021-Postage	8.25
09/13/21	07/31/2021 - ACCURINT - 110686020210731 - SEARCH SERVICES	436.78
09/17/21	07/30/2021-Postage	717.75
09/20/21	06/30/2021 - PLATINUM LITIGATION SOLUTIONS LLC - 70235 - COLOR SCANS - services for litigation discovery and document collection	2,234.67
09/21/21	07/27/2021 - PLATINUM LITIGATION SOLUTIONS LLC - 70442 - COLOR SCANS - services for litigation discovery and document collection	2,729.70
09/25/21	07/08/2021 - PLATINUM LITIGATION SOLUTIONS LLC - 70287 - COLOR SCANS / B&W SCANS / CODING - services for litigation discovery and document collection	5,228.53
09/29/21	08/31/2021 - TSG REPORTING INC - 2058380 - CERTIFIED TRANSCRIPT OF ROB WILLS	1,183.30
	Total	\$36,678.16

Exhibit E

Budget and Staffing Plan

**Budget by Matter Category for the Period from
June 1, 2021 to and Including August 11, 2021**

Matter Number	Project Category	Hours Budgeted	Total Fees Budgeted ¹
001	Asset Analysis and Recovery	0 - 3	\$0.00 - \$2,730
002	Asset Disposition	0 - 3	\$0.00 - \$2,730
005	Committee Meetings	15 - 20	\$14,100 - \$18,800
006	Business Operations	5 - 10	\$6,550 - \$13,100
007	Case Administration	45 - 60	\$49,050 - \$65,400
008	Claims Administration and Objections	0 - 3	\$0.00 - \$4,050
009	Corporate Governance and Board Matters	0 - 5	\$0.00 - \$3,050
011	Retention	5 - 10	\$5,550 - \$11,100
012	Fee Applications	75 - 85	\$42,000 - \$47,600
013	Financing and Cash Collateral	0 - 3	\$0.00 - \$2,910
014	Litigation	1,000 - 1,200	\$900,000 - \$1,080,000
015	Plan and Disclosure Statement	325 - 375	\$383,500 - \$442,500
021	Tax	15 - 25	\$23,400 - \$39,000
024	Creditor Communications	5 - 15	\$6,650 - \$19,950
	TOTAL AMOUNT BUDGETED	1,500 - 1,800	\$1,440,000 - \$1,728,000
	TOTAL AMOUNT	1,656.70	\$1,594,947.50
	TOTAL AMOUNT WITH 10% DISCOUNT	1,656.70	\$1,435,452.75

¹ Budgeted amounts do not necessarily reflect to a 1:1 ratio because they reflect a blended hourly rate and a variable allocation of timekeepers and hours, depending on the needs for each category.

**Staffing Across All Matter Categories for the Period from
June 1, 2021 to and Including August 11, 2021**

Category of Timekeeper	Number of Timekeepers Expected to Perform Work Across All Matter Categories During the Application Period	Average Hourly Rate²
Partner	6 - 7	\$1,287
Senior Counsel/Counsel	0 -1	\$1,175
Associate (3+ years since first admission)	6 - 7	\$919
Jr. Associate (1–3 years since first admission)	3 - 4	\$667
Paraprofessionals	2 - 3	\$481
Support Staff	1 – 3	\$248
Total Attorney	15 – 19	\$1,001
Total Non-Attorney	3 – 6	\$441
Total	18 – 25	\$963
Total with 10% Discount	18 – 25	\$866

² The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of chargeable hours worked by, each timekeeper during the Interim Fee Period.

Exhibit F

Customary and Comparable Compensation Disclosure

Customary and Comparable Compensation Disclosure

The blended hourly rate of the Sidley timekeepers (including both professionals and paraprofessionals) who provided services to the Committee for the 20th and 21st Monthly Fee Periods (June 1, 2021 through August 11, 2021) was \$962.76 per hour (the “Committee Blended Rate”).¹ The Committee Blended Rate after applying a 10% Discount was \$866.48 per hour.

The blended hourly rate of the Sidley timekeepers (including both professionals and paraprofessionals) who provided services to the Committee for the Final Fee Period (October 29, 2019 through August 11, 2021) was \$947.79 per hour (the “Committee Blended Rate”).² The Committee Blended Rate after applying a 10% Discount was \$853.01 per hour.

The blended hourly standard rate for all of Sidley’s domestic, non-bankruptcy timekeepers during the twelve-month period from September 1, 2020 to and including August 31, 2021 (the “Comparable Period”) was, in the aggregate, approximately \$969.00 (the “Non-Bankruptcy Blended Rate”).³

A detailed comparison of the Committee Blended Rate, Committee Blended Rate with 10% Discount and the Non-Bankruptcy Blended Rate is set forth in the chart below.

Category of Timekeeper	Committee Blended Rate	Committee Blended Rate with 10% Discount	Non-Bankruptcy Blended Rate
Partner	\$1,287	\$1,158.30	\$1,253
Senior Counsel/Counsel	\$1,175	\$1,057.50	\$1,082
Associate	\$919	\$827.10	\$929
Junior Associate	\$667	\$600.30	\$676
Paraprofessional	\$481	\$432.90	\$368
Aggregate	\$963	\$866.48	\$969

¹ Sidley calculated the Committee Blended Rate by dividing the total fees billed by Sidley timekeepers to the Committee during the Interim Fee Period by the total number of chargeable hours worked by such timekeepers on behalf of the Committee during such period. The Committee Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley, if any, prior to the filing of the Application.

² Sidley calculated the Committee Blended Rate by dividing the total fees billed by Sidley timekeepers to the Committee during the Interim Fee Period by the total number of chargeable hours worked by such timekeepers on behalf of the Committee during such period. The Committee Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley, if any, prior to the filing of the Application.

³ Sidley calculated the Non-Bankruptcy Blended Rate by dividing the total amount of fees billed to clients by Sidley’s domestic, non-bankruptcy timekeepers during the Comparable Period by the total number of chargeable hours worked on behalf of clients by such timekeepers during the Comparable Period. The Non-Bankruptcy Blended Rate does not include fees and corresponding chargeable hours voluntarily reduced by Sidley prior to submission of the relevant invoices to Sidley’s clients. For the avoidance of doubt, the Non-Bankruptcy Blended Hourly Rates reflect Firm-wide increases that took effect across all of the Firm’s practice groups on January 1, 2021.